

Desirée Townsend
2901 Ocean Park Blvd., Suite 201
Santa Monica, CA 90405
desiree@sparktrademarks.com

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Superior Court of California,
County of Los Angeles
8/5/2025 10:57 PM
David W. Slayton, Clerk of Court

RESPONDENT *IN PRO SE*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

MARIO LOPEZ,

Petitioner,

v.

DESIREE TOWNSEND,

Respondent.

Case No.: 25STRO03858

ASSIGNED FOR ALL PURPOSES TO HON
KIMBERLY REPECKA, DEPT. 65

**SUPPLEMENTAL DECLARATION AND
EXHIBITS OF DESIREE TOWNSEND IN
SUPPORT OF OPPOSITION TO PETITION
FOR RESTRAINING ORDER**

Hearing Date: August 8, 2025
Time: 1:30 P.M.
Dept.: 65

I, Desirée Townsend, declare as follows:

1. I am the Plaintiff in this action. I have personal knowledge of the facts stated herein and, if called as a witness, could and would competently testify thereto.
2. Attached hereto as Exhibits A and B are true and correct copies of text message communications, TikTok direct messages, and photographs (including associated metadata) that I received from an individual who was identified under oath by Petitioner's wife, Courtney Lopez, and confirmed by both Petitioner and his wife as working in concert with Petitioner's attorney, Alexandra Kazarian. According to their sworn statements, this individual was allegedly acting to extract information from me and to feed me false

1 information in furtherance of Petitioner's legal strategy. These materials are directly
2 relevant to and support my Opposition to the Petition for Restraining Order.

- 3 3. Exhibits A and B corroborate the sworn testimony of Petitioner and his wife that their
4 attorney, Alexandra Kazarian, was working with an individual to gain my trust in order to
5 portray me as "unhinged" (See Exhibit B, page 17) in support of this Petition. Additionally,
6 the individual was tasked with feeding me false information, including that Petitioner
7 Mario Lopez was under investigation by NBCUniversal for sexual harassment. This
8 misinformation was used to provoke online commentary that could then be
9 mischaracterized as harassment in support of the restraining order request.
- 10 4. These communications were sent to and/or from my personal mobile device and TikTok
11 account and were preserved at or near the time they were exchanged. The attached exhibits
12 are true and accurate screenshots of those messages. They have not been edited, redacted,
13 or otherwise modified, except as necessary to highlight relevant portions or remove
14 personal identifying information unrelated to this litigation.
- 15 5. Attached hereto as Exhibits C, D, and E are (1) personal photographs and associated
16 metadata sent by the individual believed to be working in concert with Petitioner's
17 attorney; (2) a news article and official press release from the San Luis Obispo County
18 District Attorney's Office, which includes photos and details confirming Mr. Johnstone's
19 criminal history and identity; and (3) confirmation from a former girlfriend identifying him
20 as convicted felon Josiah James Johnstone.
- 21 6. Prior to the sworn testimony of Petitioner and Petitioner's wife, I independently located
22 and contacted a woman believed to be Becky Heart, one of the named victims referenced
23 in Exhibit D. I identified her by researching her business and contacting her directly by
24 phone. During our conversation, I provided her with photographs that had been sent to me
25 by the individual in question. Ms. Heart confirmed that the man in the photographs was
26 indeed her former boyfriend, Josiah James Johnstone, the same convicted felon referenced
27 in the District Attorney's press release. Based on her confirmation, I believe Mr. Johnstone
28

1 is the same individual later identified under oath as working in concert with Petitioner's
2 attorney to manipulate and undermine my credibility in this proceeding.

3 7. Each exhibit is clearly labeled and corresponds to references made in my Special Motion
4 to Strike, filed on August 1, 2025, specifically on page 1, which describes an individual
5 who boasted that Petitioner spent \$50,000 on a retainer for this matter (See Special Motion,
6 Exhibit A). This is the same individual who also exposed my personal cell phone number
7 online.

8 8. Additionally, attached hereto as Exhibit F is documentation confirming my single lawful
9 visit to NBCUniversal's property. Despite Petitioner's sworn testimony that I had been on
10 the NBCUniversal lot on multiple occasions, I have only been on the property once in the
11 last ten years, on Saturday, June 7, 2025, during the Cine Gear Expo LA, a publicly
12 advertised industry event open to ticketed attendees. I lawfully attended the event as a
13 representative of Women in Media, a registered 501(c)(3) nonprofit organization of which
14 I am a member. Women in Media was an official exhibitor at the event, and my attendance
15 was strictly for professional and charitable purposes. Moreover, this visit occurred on a
16 Saturday, a non-filming day for most productions, and at no time did I seek out or attempt
17 to contact Petitioner. I have publicly pledged that any monetary award I receive from my
18 defamation lawsuit against Petitioner will be donated to Women in Media to support their
19 mission of advancing gender equity in the entertainment industry. Attached as Exhibit F
20 are true and correct copies of my event registration email and a screenshot of my
21 membership profile on the Women in Media website.

22 9. I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct.

24 Executed this 5th day of August 2025, at Glendale, California.

25
26 By: 
27 DESIREE GUERRIERE TOWNSEND
28 Plaintiff

EXHIBIT A

10:17



Account not found



Account not found

@city_of_angels_la

Jun 9, 2:49 PM



Hi you work with Mario?

I don't want you to get in trouble at work though. That's my only concern.

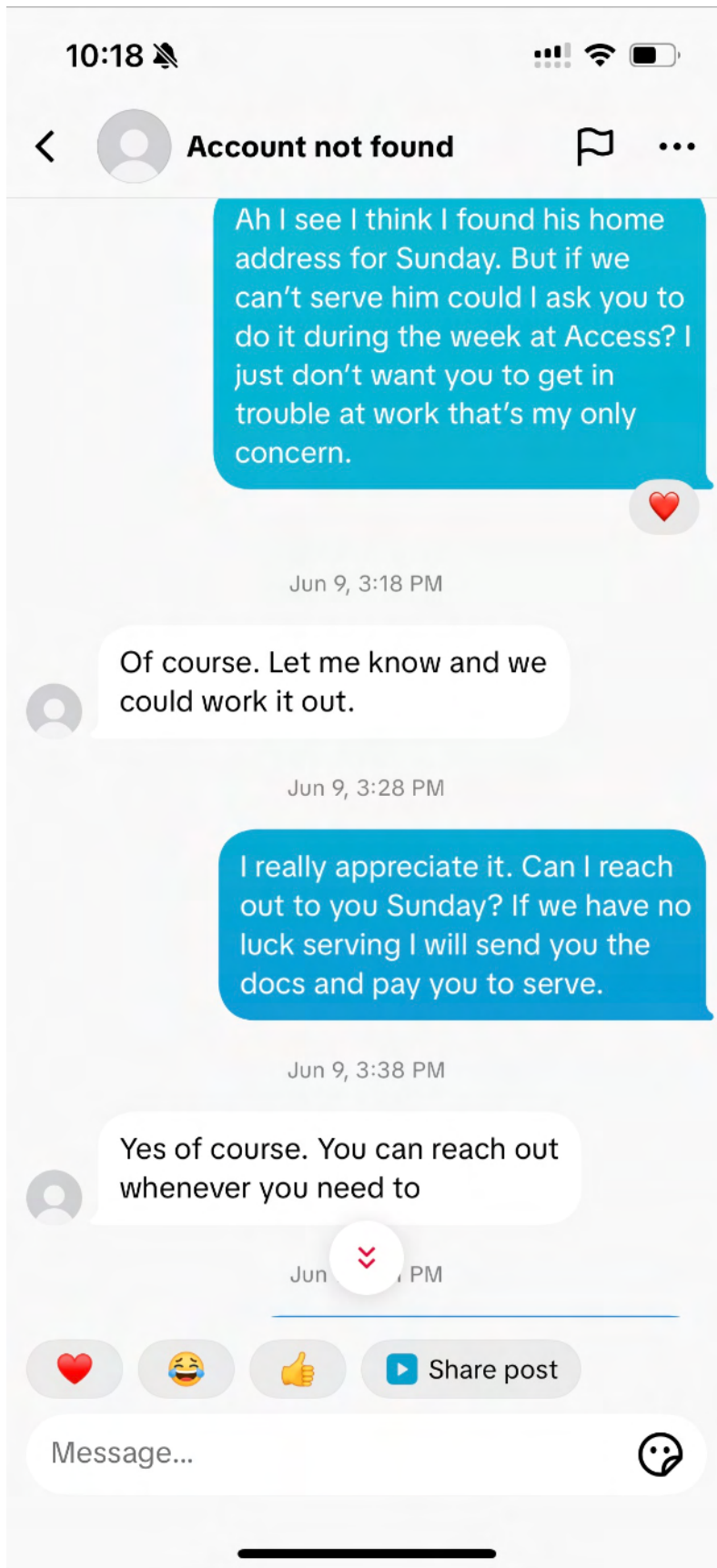
Hello. I don't work with him anymore, but work for the same company Access Hollywood is aired on and we are able to figure out how you can serve him.

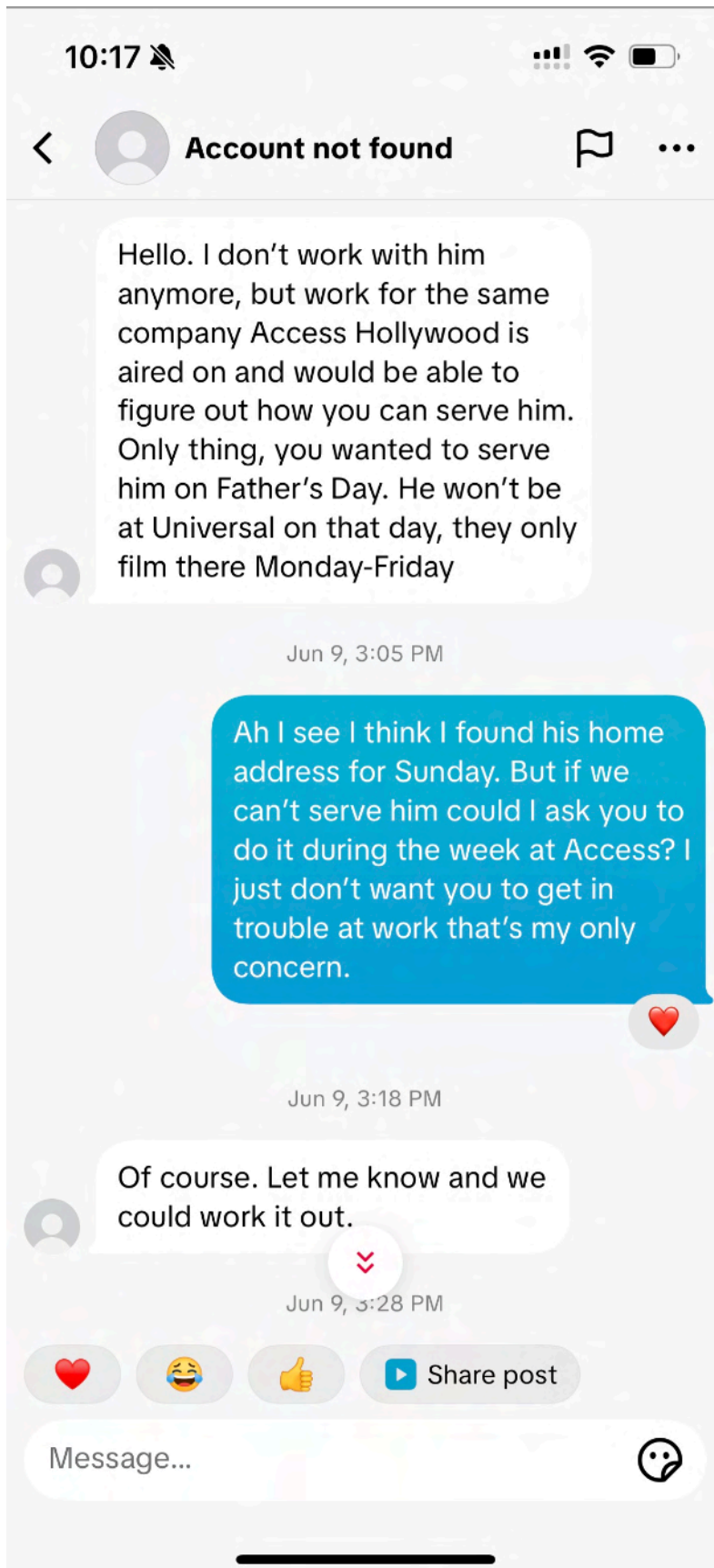


Share post

Message...







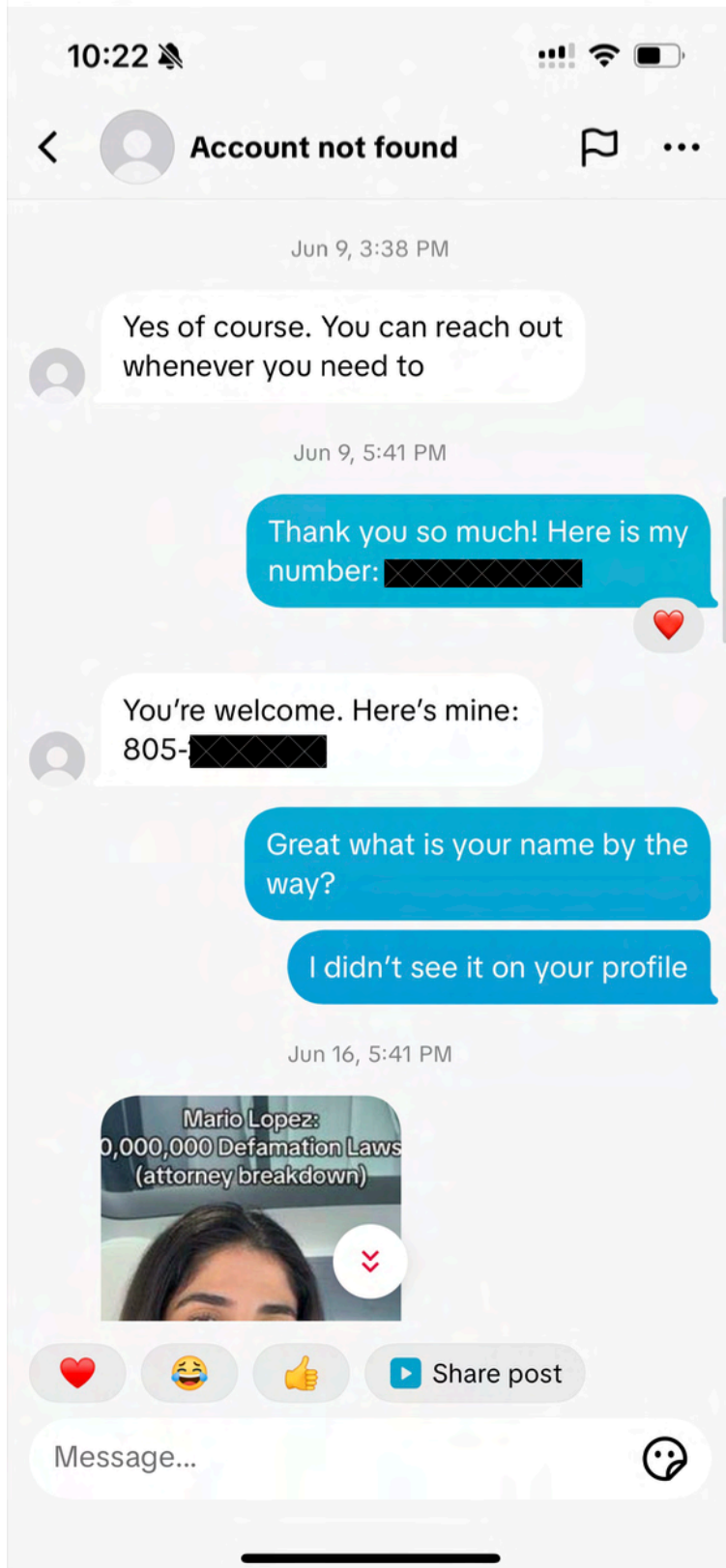
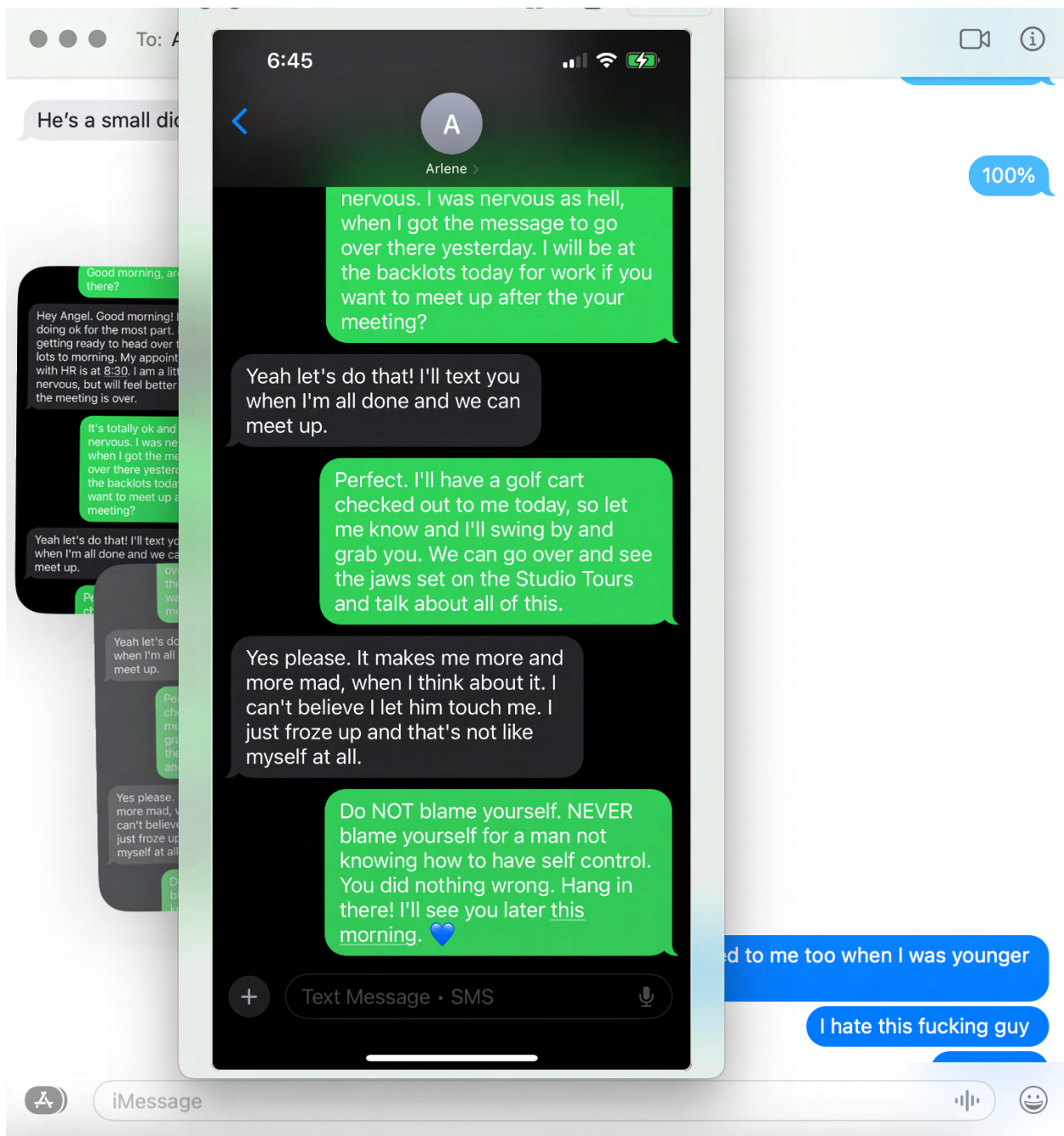
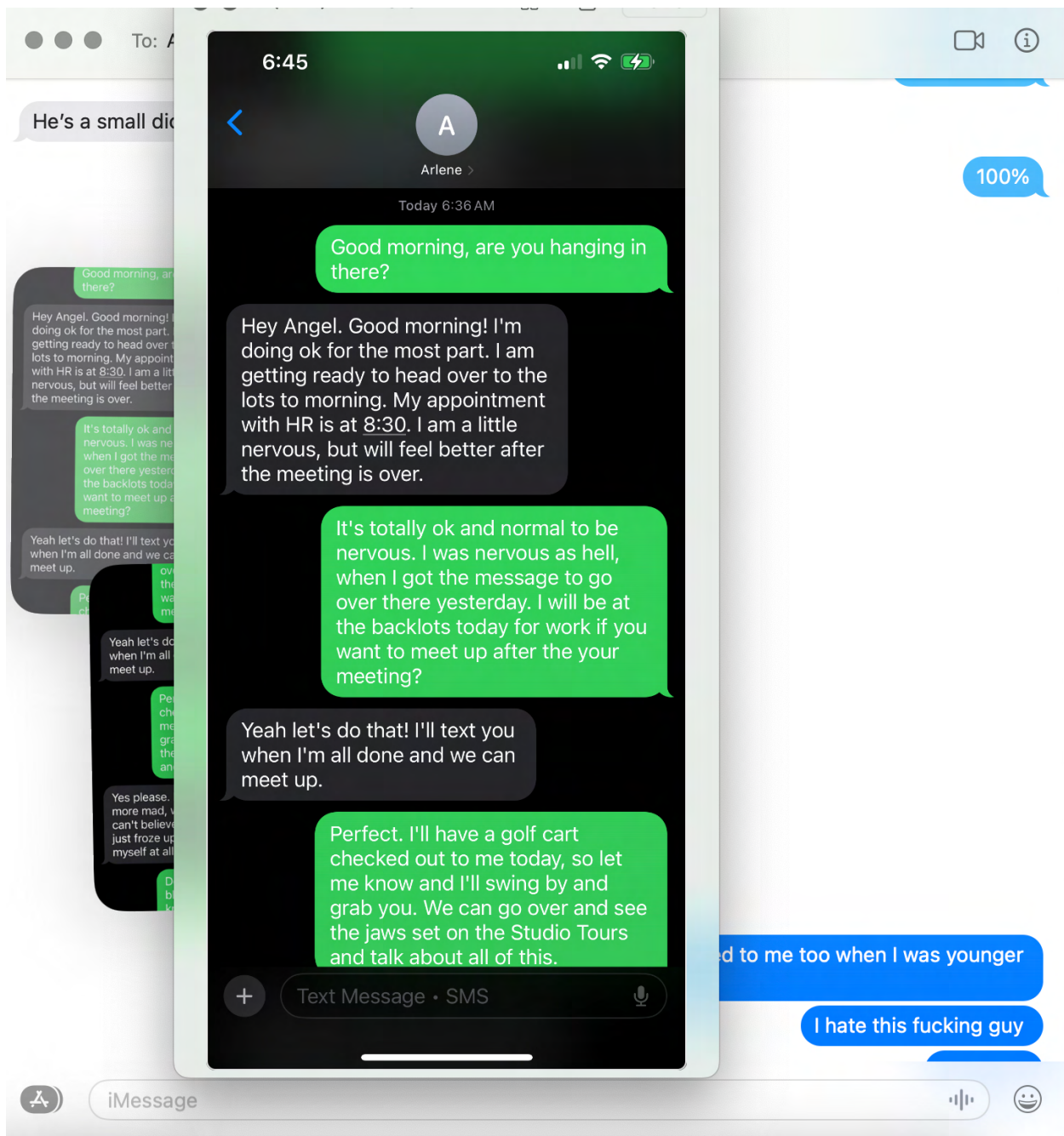
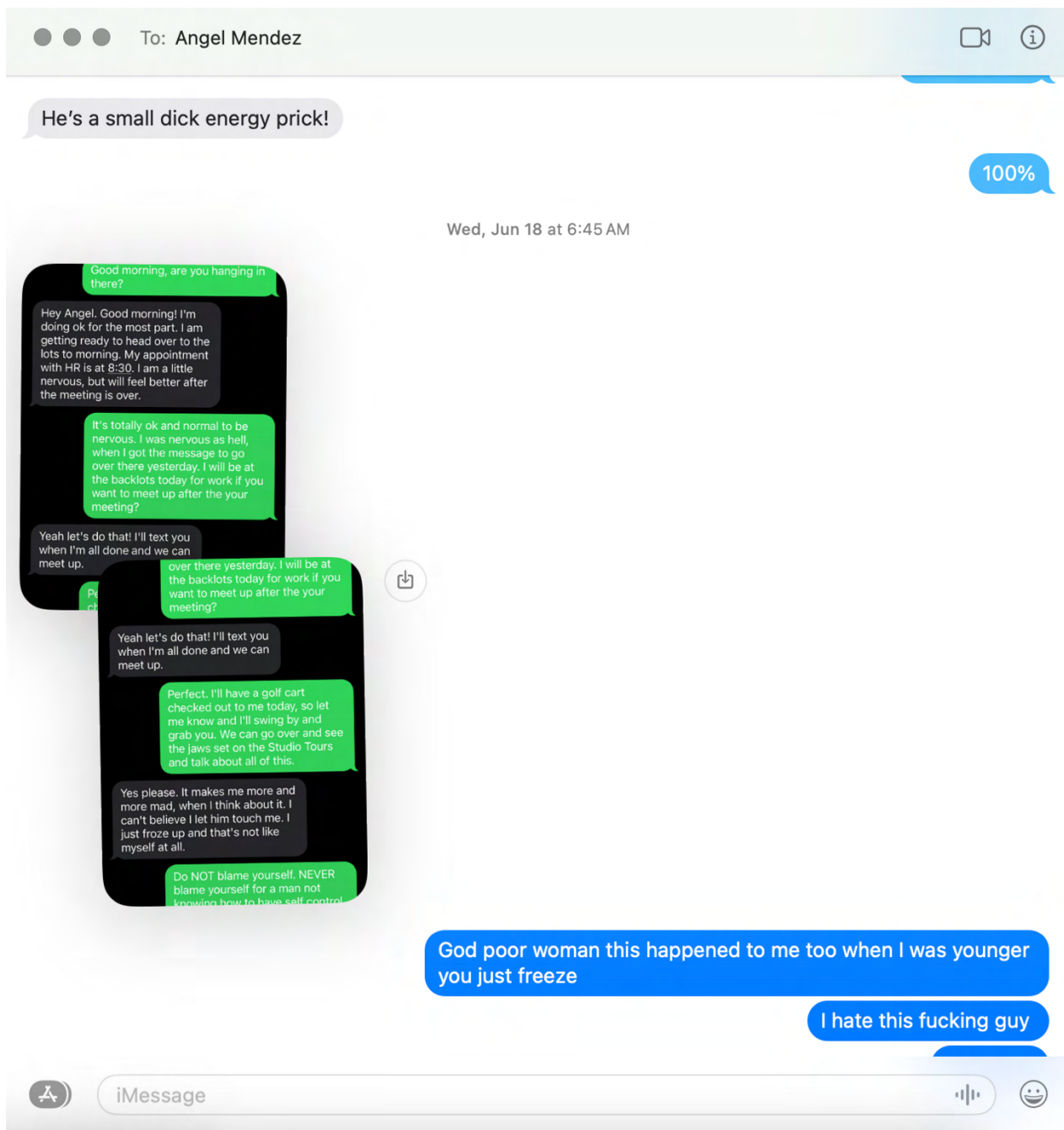
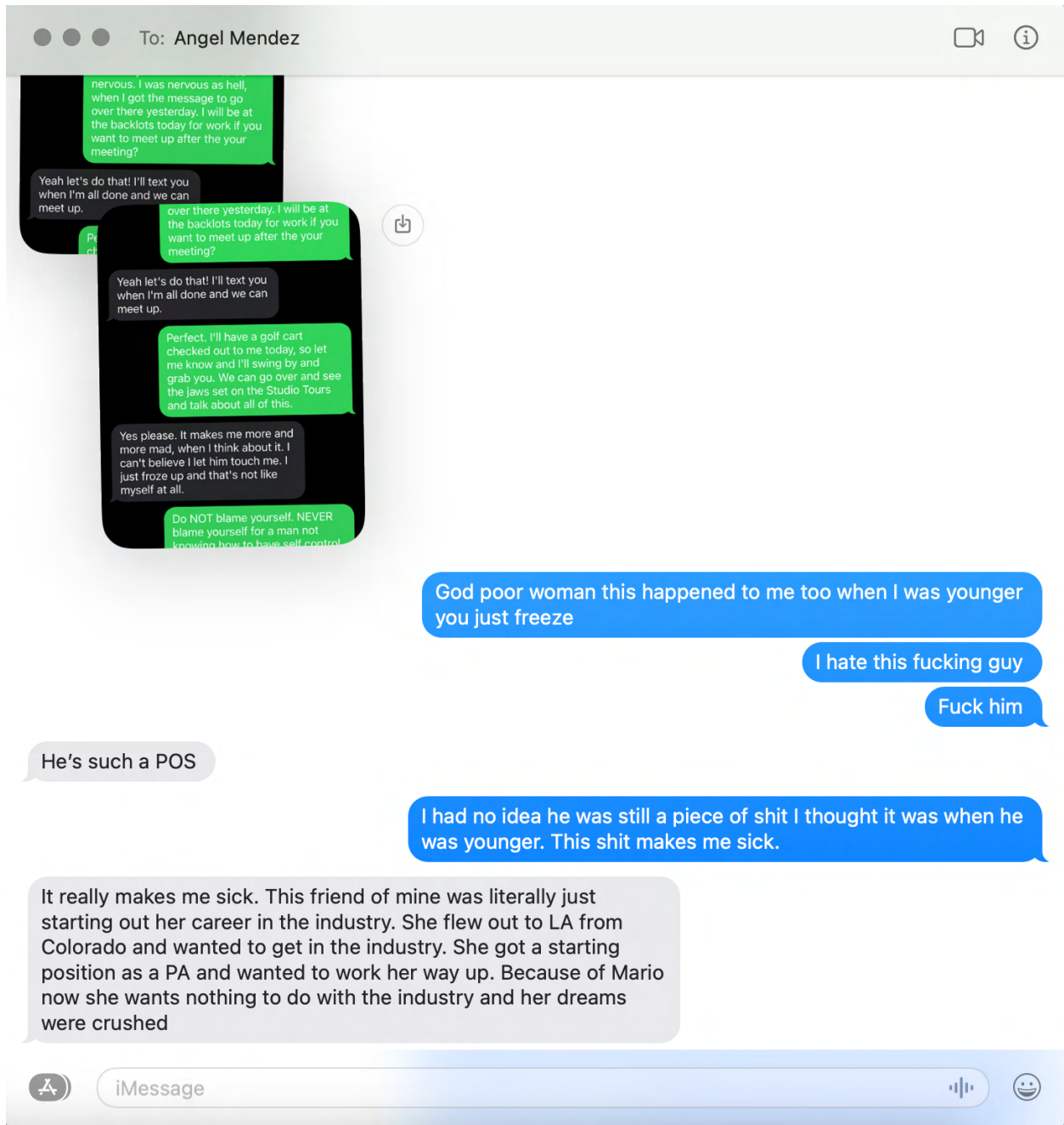


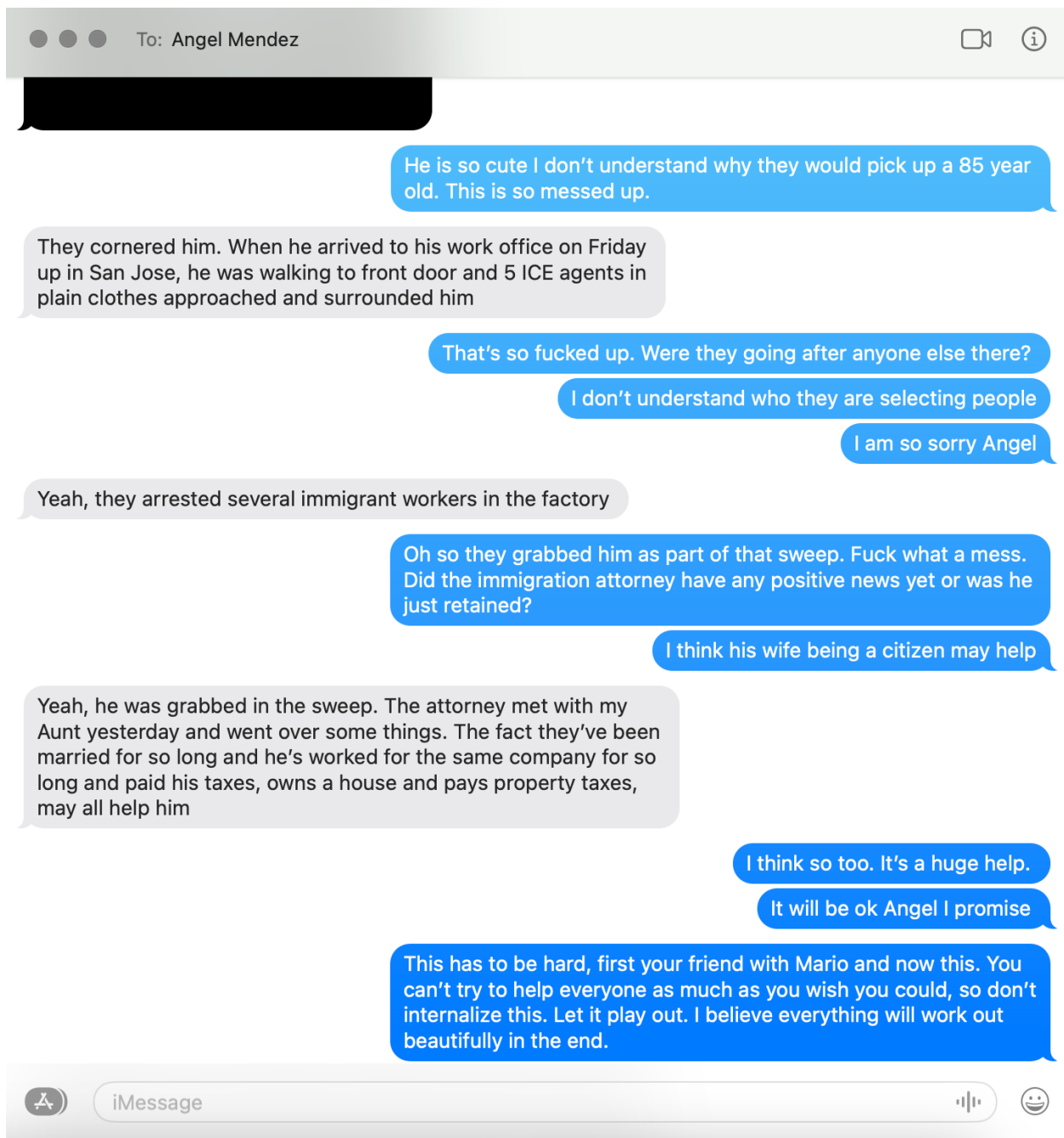
EXHIBIT B

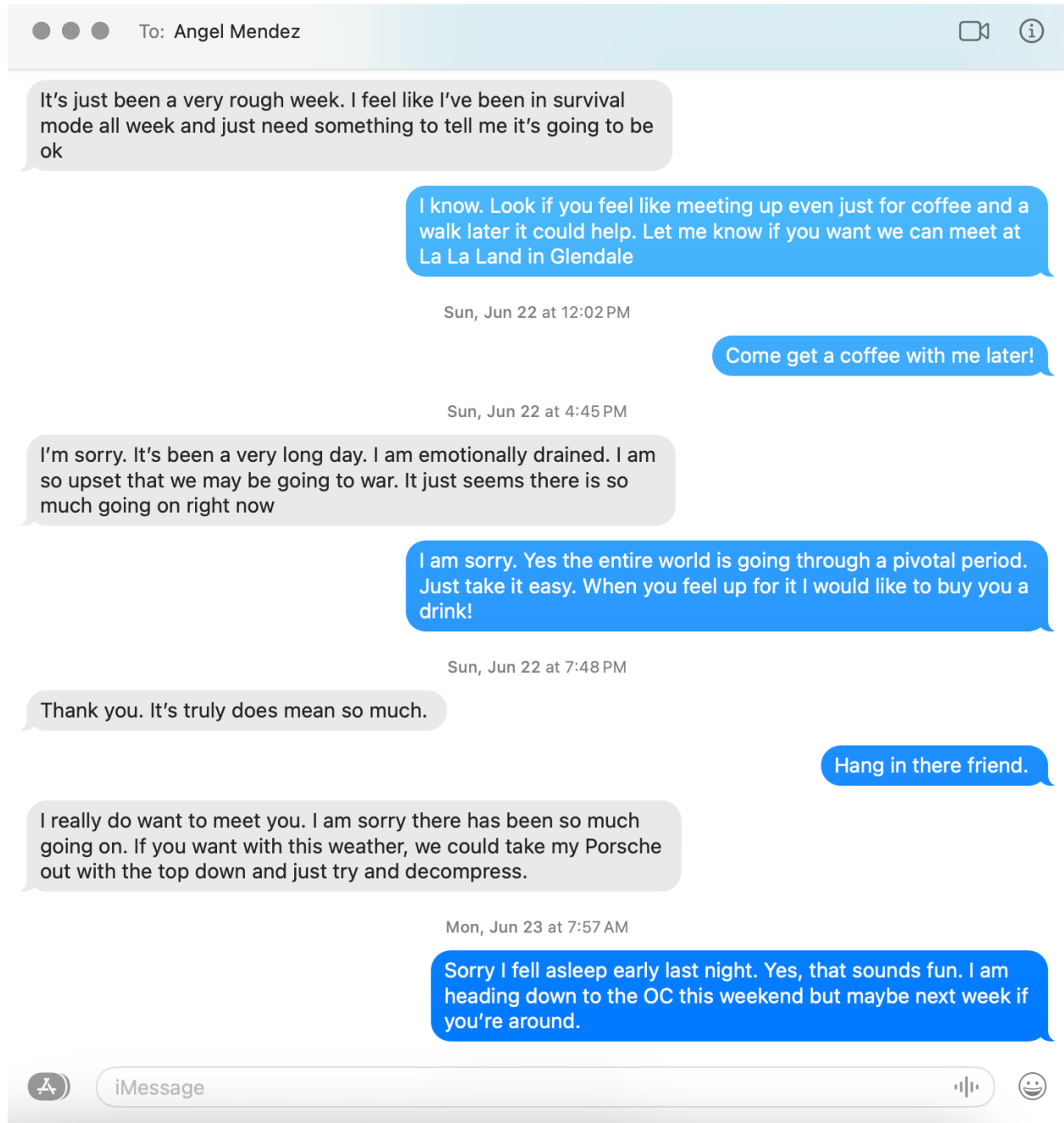


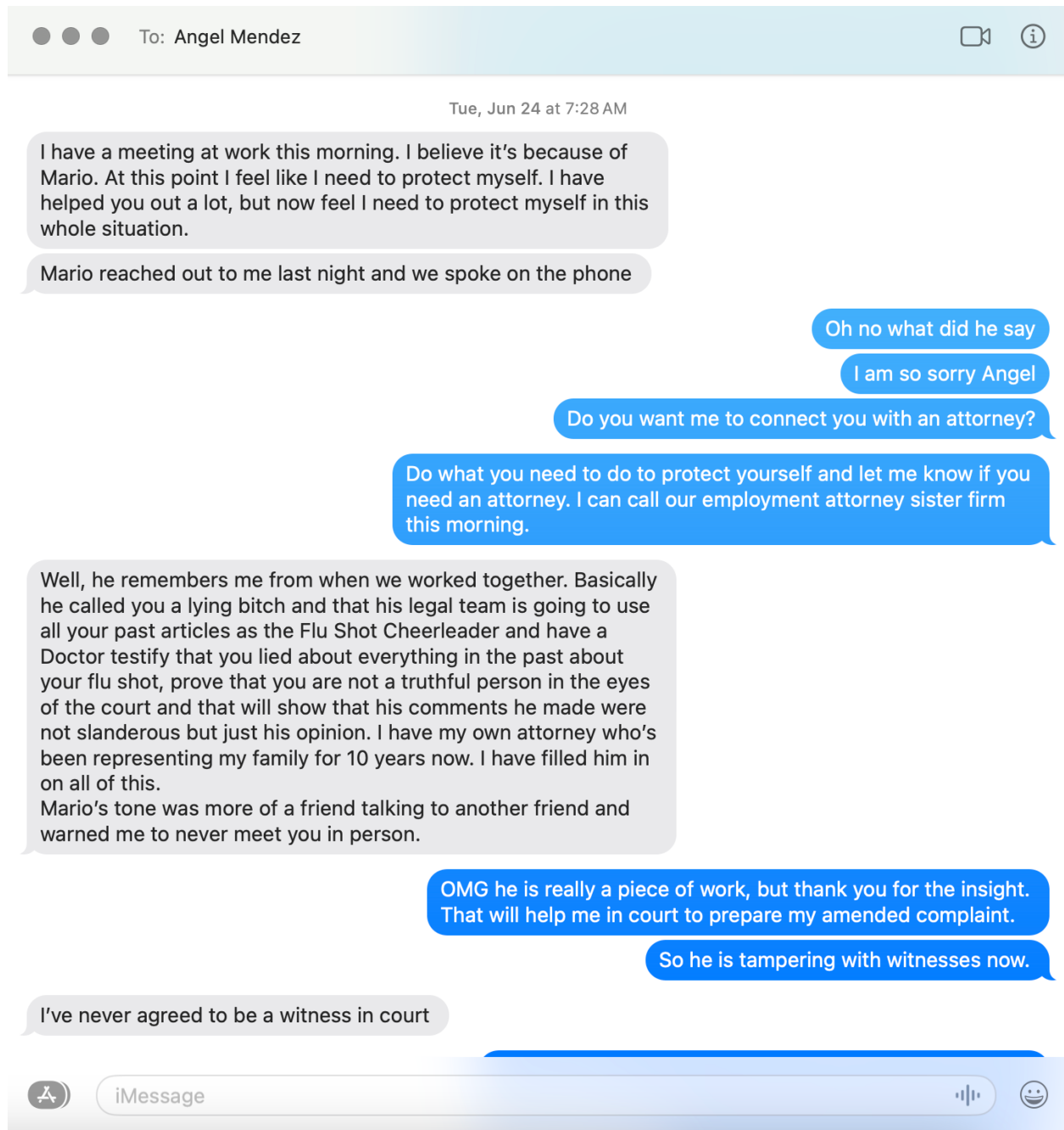


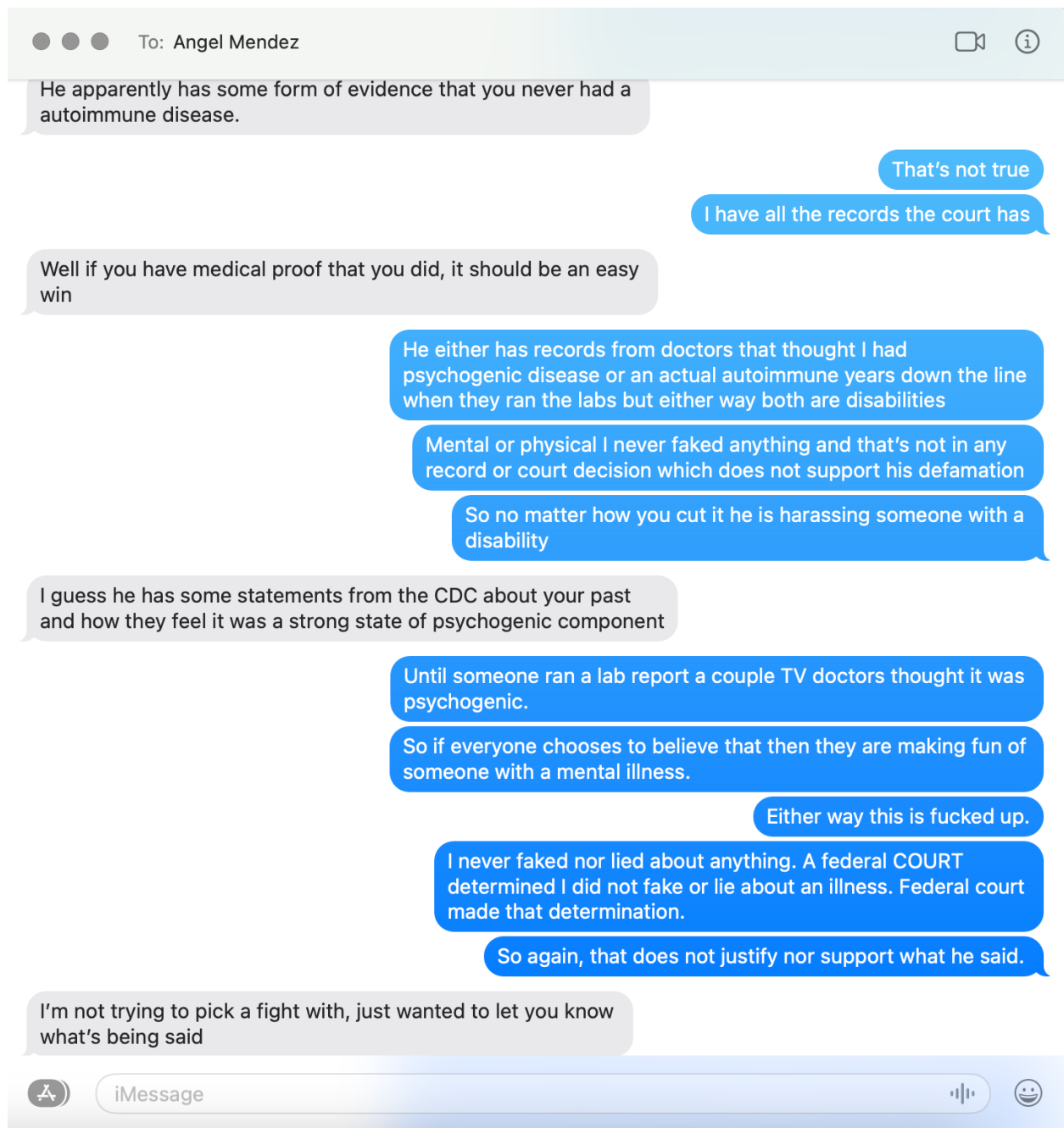


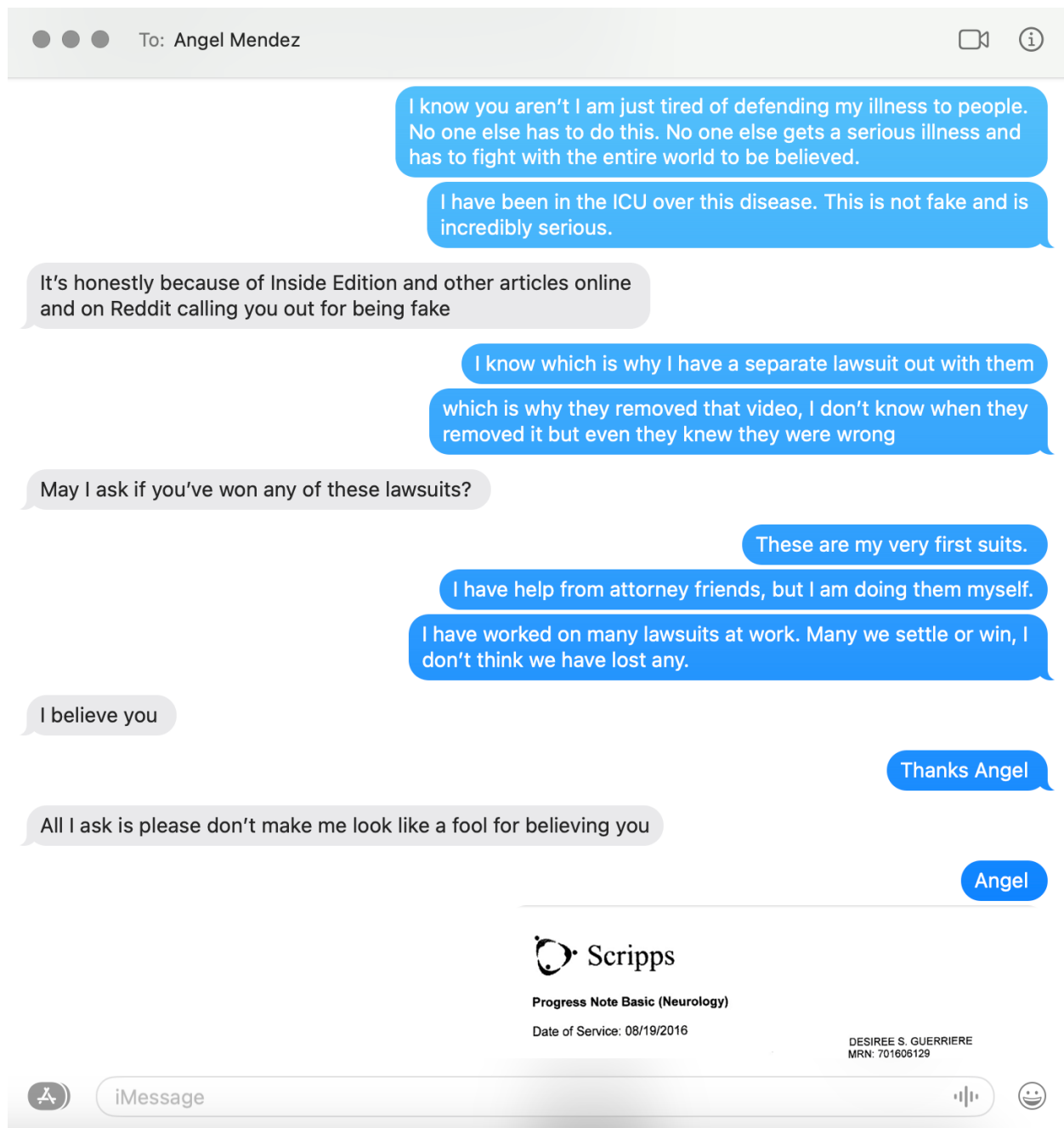












To: Angel Mendez

DESIREE GUERRIERE

Desiree Guerriere. Female, 32 years old.
Reason for visit: Review of test results for neurological conditions, provisional diagnosis myasthenia gravis and dysautonomia.

Test Results

1. Acetylcholine receptor antibodies and MuSK antibodies negative.
2. Negative results for Mayo Clinic autonomic antibody panel, SSA, SSB, Fodrin antibodies.
3. Celiac haplotype risk <0.1 x
4. Positive GAD antibodies 22.2 (<5).

History

Reports that episodes of stridor and neck spasms respond to IVIg (?SPS (Stiff-person syndrome).

Clumsy, falls especially in dark.

Ataxic. Seems to be sensory, rather than cerebellar. Has positive Romberg's sign and deafferentation pseudoweakness, with irregular motor effort on examination that is stabilized by visual fixation.

This morning, all of her involuntary movements are slow, almost apraxic. Extraocular movements ~ no nystagmus, also seem difficult to perform.

Assessment

1. Likely seronegative myasthenia gravis.
2. Dysautonomia – cardiovascular (orthostatic) and gastrointestinal predominantly.
3. Sensory ataxia, does not appear to be cerebellar.
4. Cognitive impairment, likely autoimmune encephalopathy.
5. Episodic muscle spasms, including laryngeal and cervical, possibly manifestations of stiff person syndrome, with accompanying anti-GAD antibodies.
6. Appears to have an incomplete DAME Syndrome (Dysautonomia, Autoimmune disease, Mast cell activation

This document is privileged and confidential, and is intended for those individuals personally involved in the care of individual patients who may be identifiable from this information. All other use or disclosure is strictly prohibited unless specifically and legally authorized.

You are not a fool.

I also had a feeding tube for years. I was only able to get it removed a couple years ago.

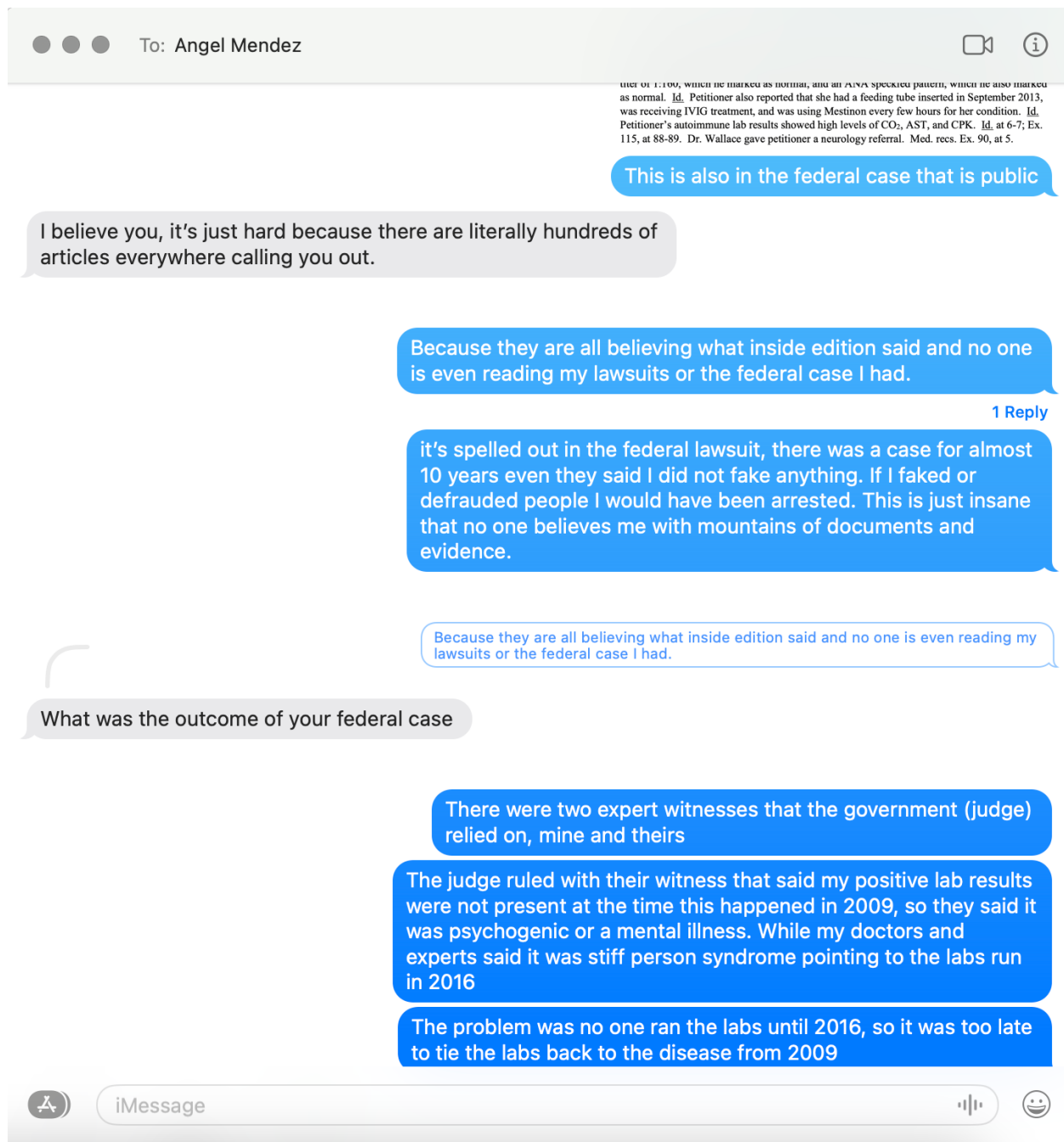
This was not a faked illness.

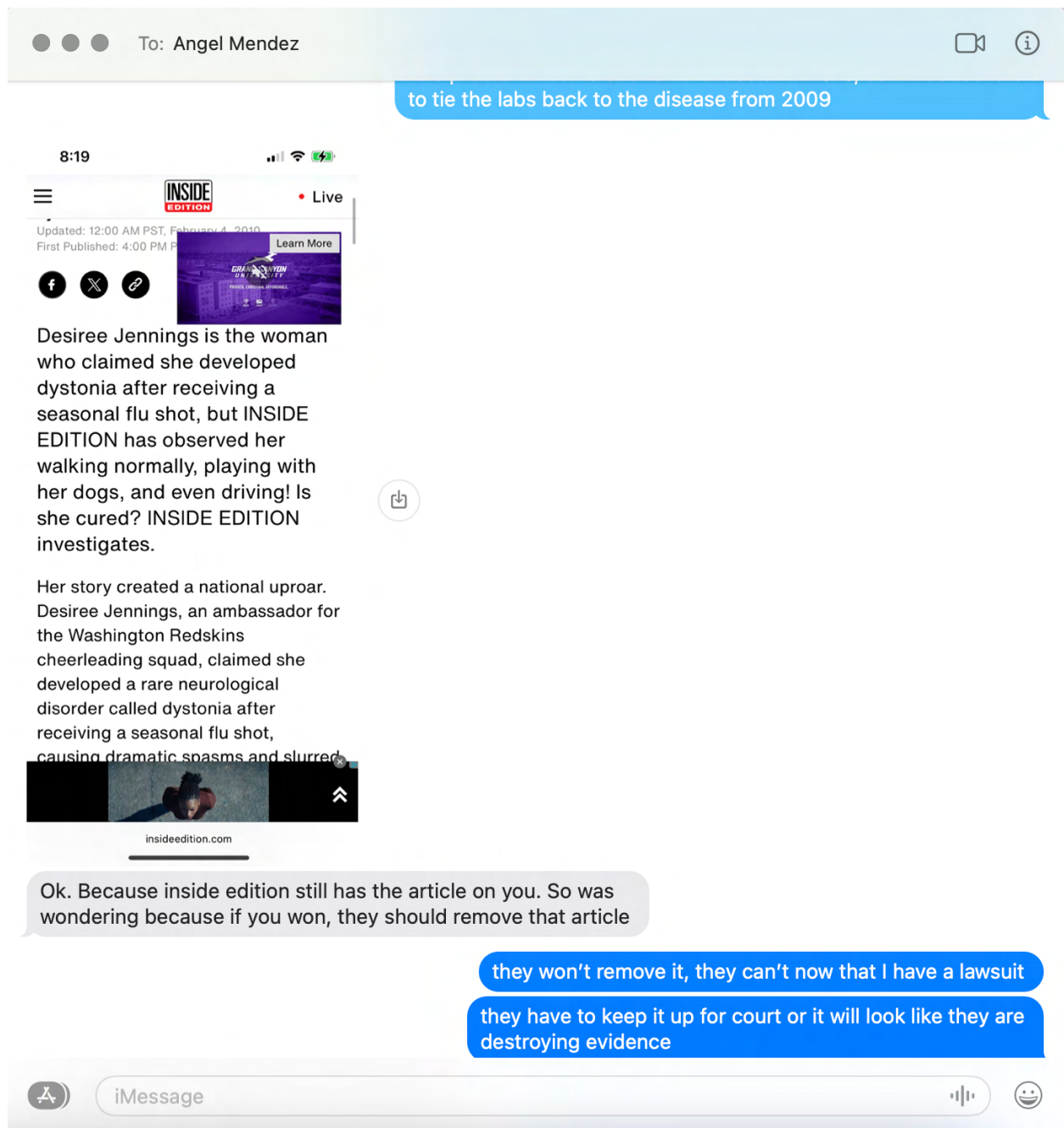
On March 27, 2014, petitioner saw Dr. Daniel J. Wallace. Med. recs. Ex. 90, at 1. Petitioner reported that she had abnormal diffuse joint pain and she felt pain in her flank when she breathed deeply. Id. at 2. Dr. Wallace noted that on April 18, 2012, petitioner had an ANA titer of 1:160, which he marked as normal, and an ANA speckled pattern, which he also marked as normal. Id. Petitioner also reported that she had a feeding tube inserted in September 2013, was receiving IVIG treatment, and was using Mestinon every few hours for her condition. Id. Petitioner's autoimmune lab results showed high levels of CO₂, AST, and CPK. Id. at 6-7; Ex. 115, at 88-89. Dr. Wallace gave petitioner a neurology referral. Med. recs. Ex. 90, at 5.

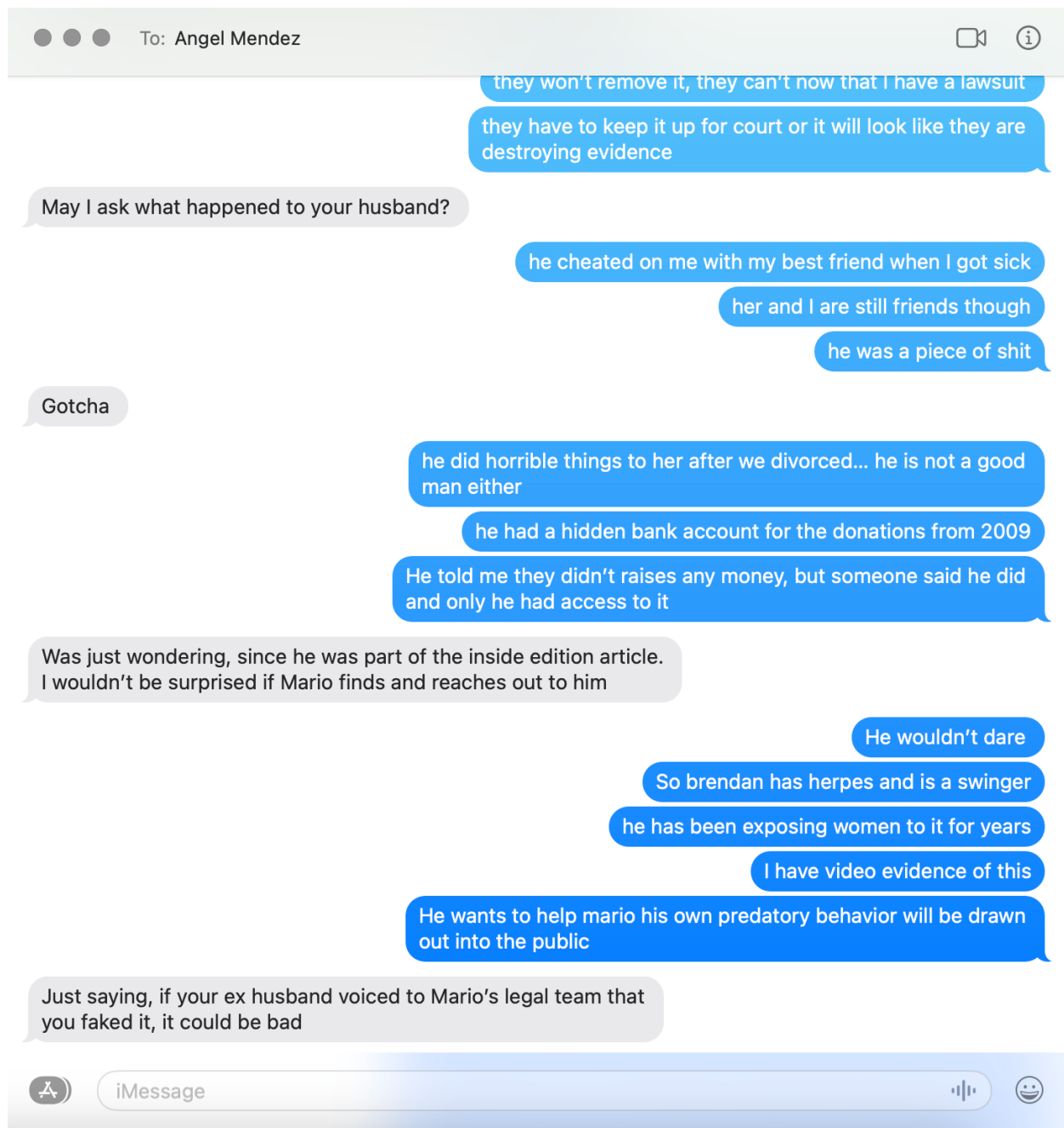
This is also in the federal case that is public

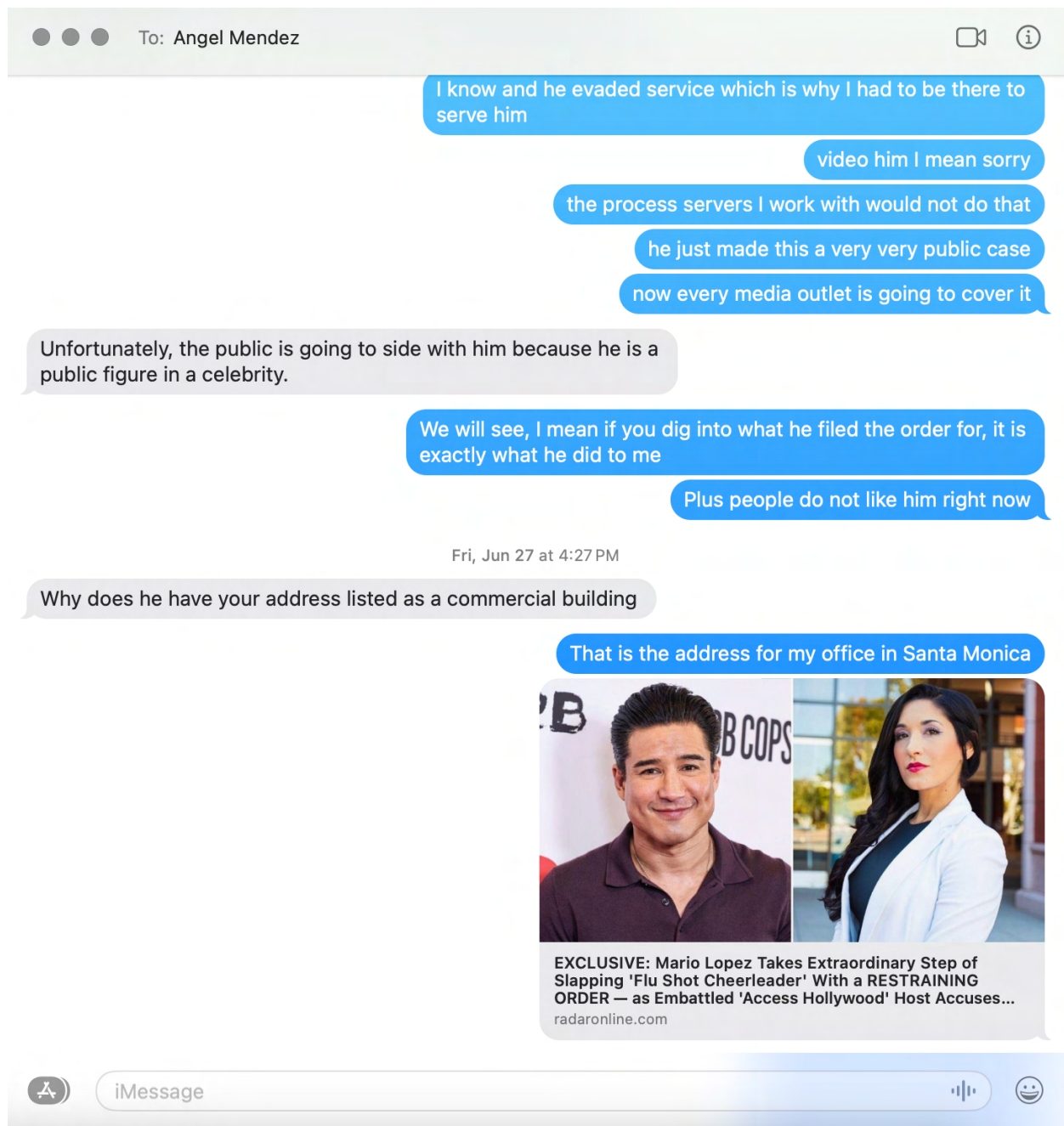
I believe you, it's just hard because there are literally hundreds of articles everywhere calling you out.

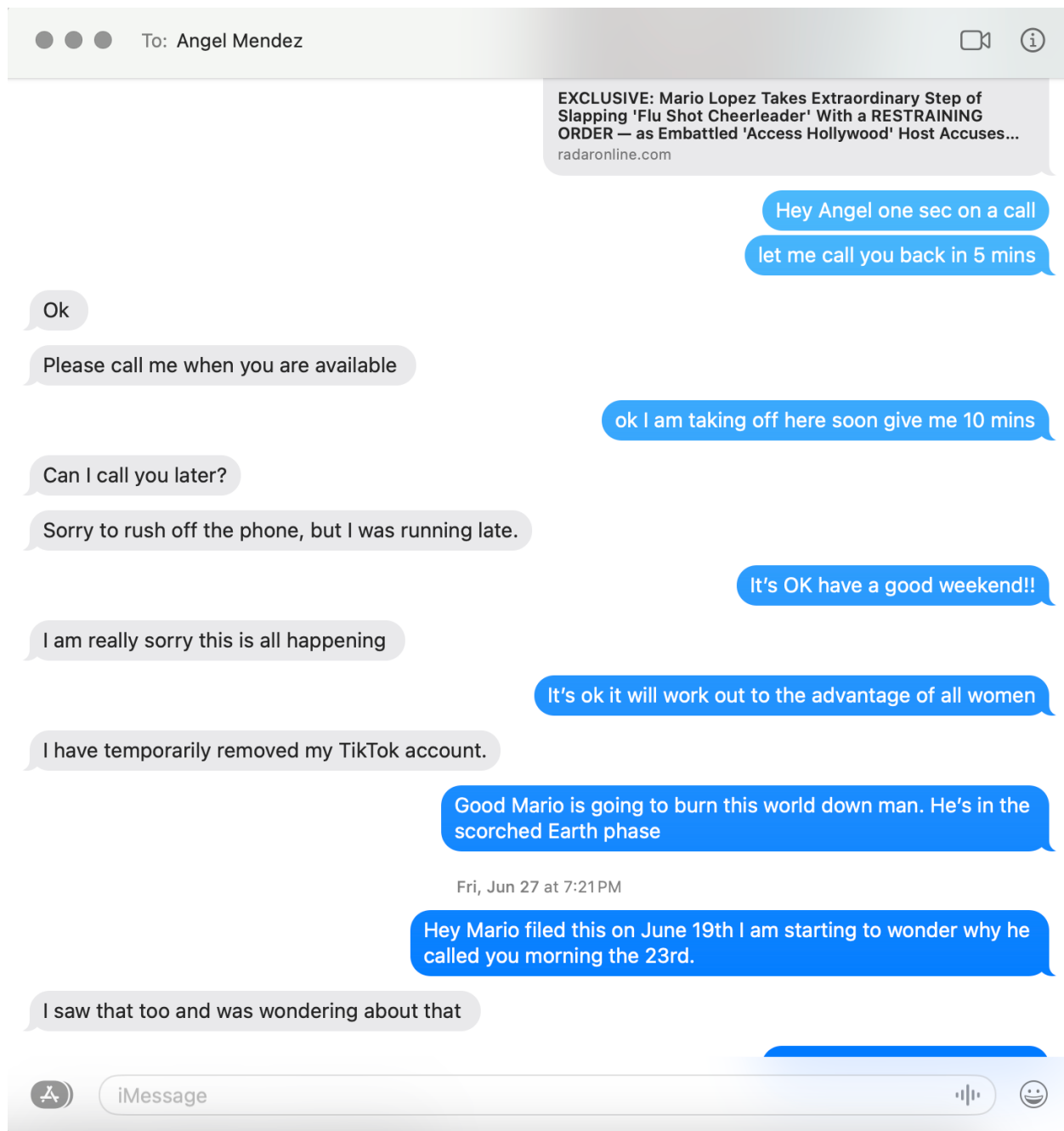
iMessage

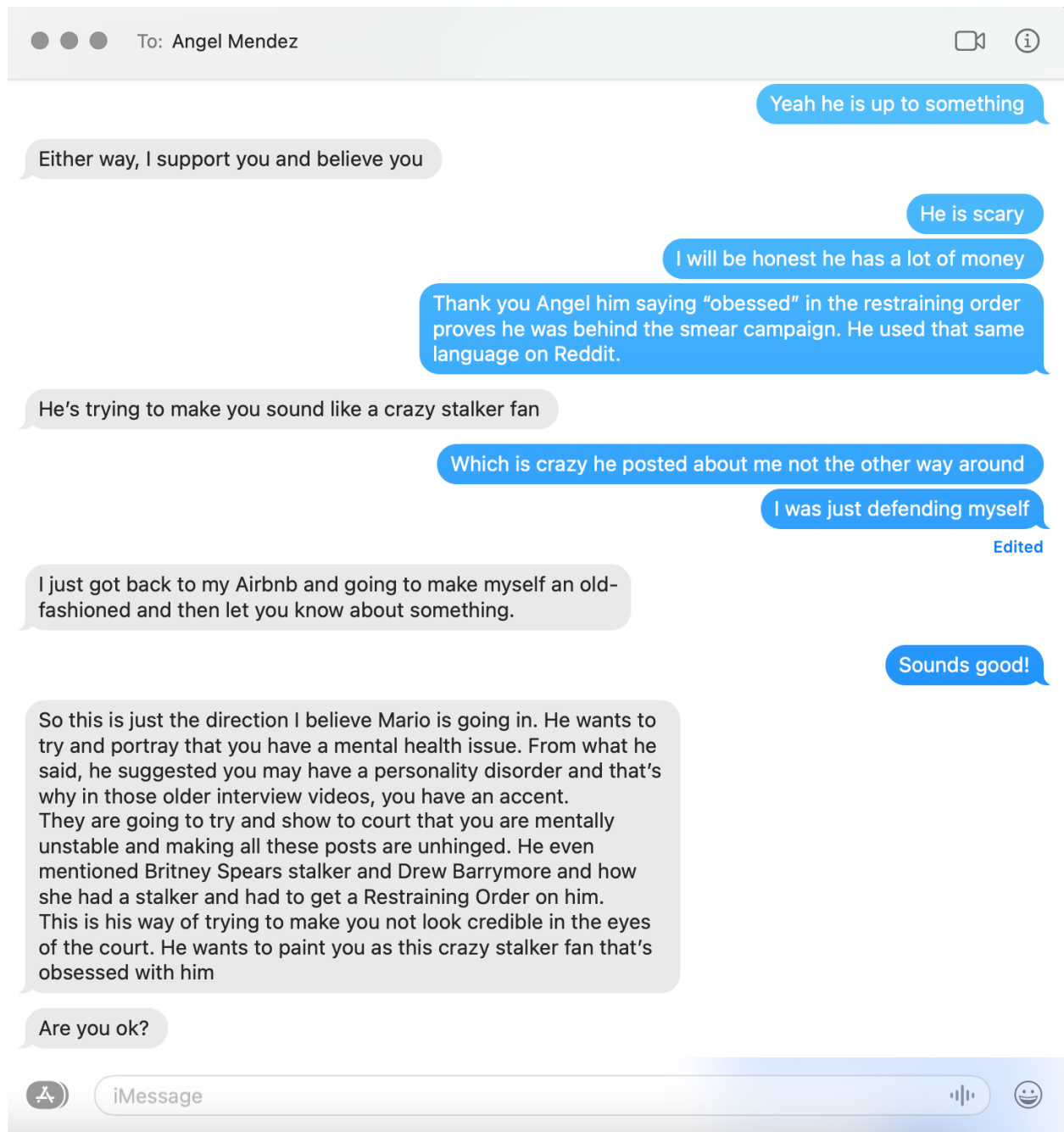


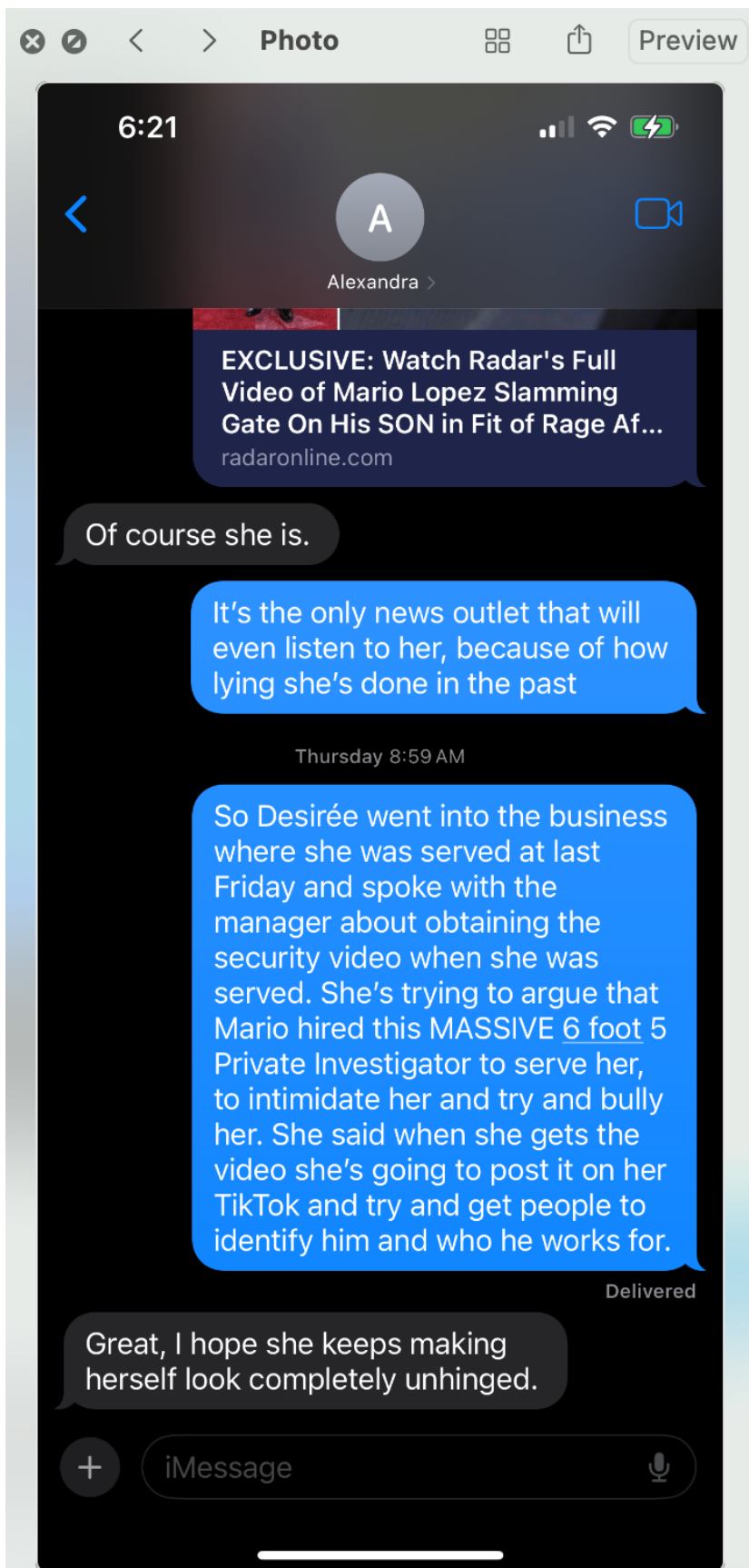


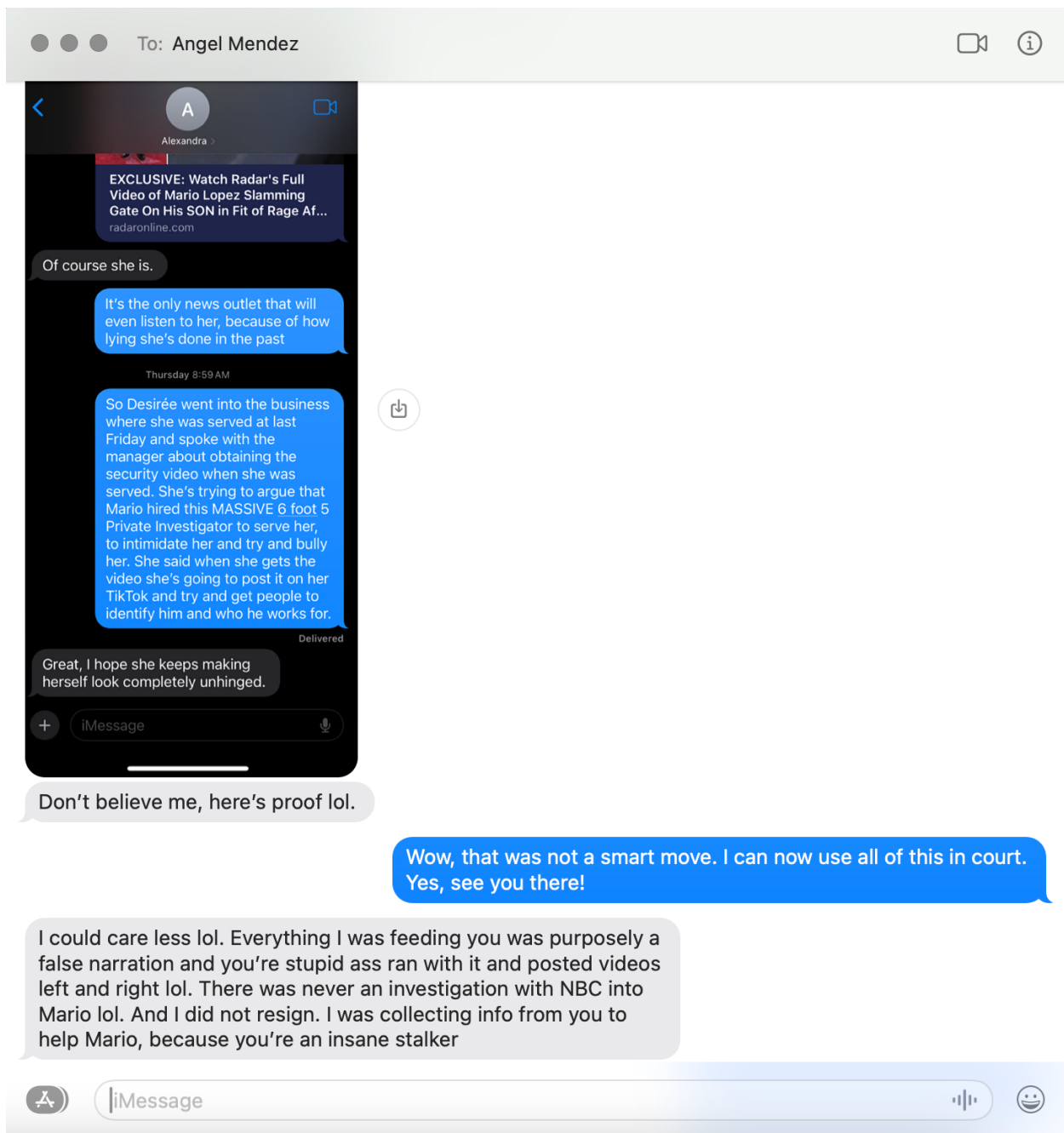












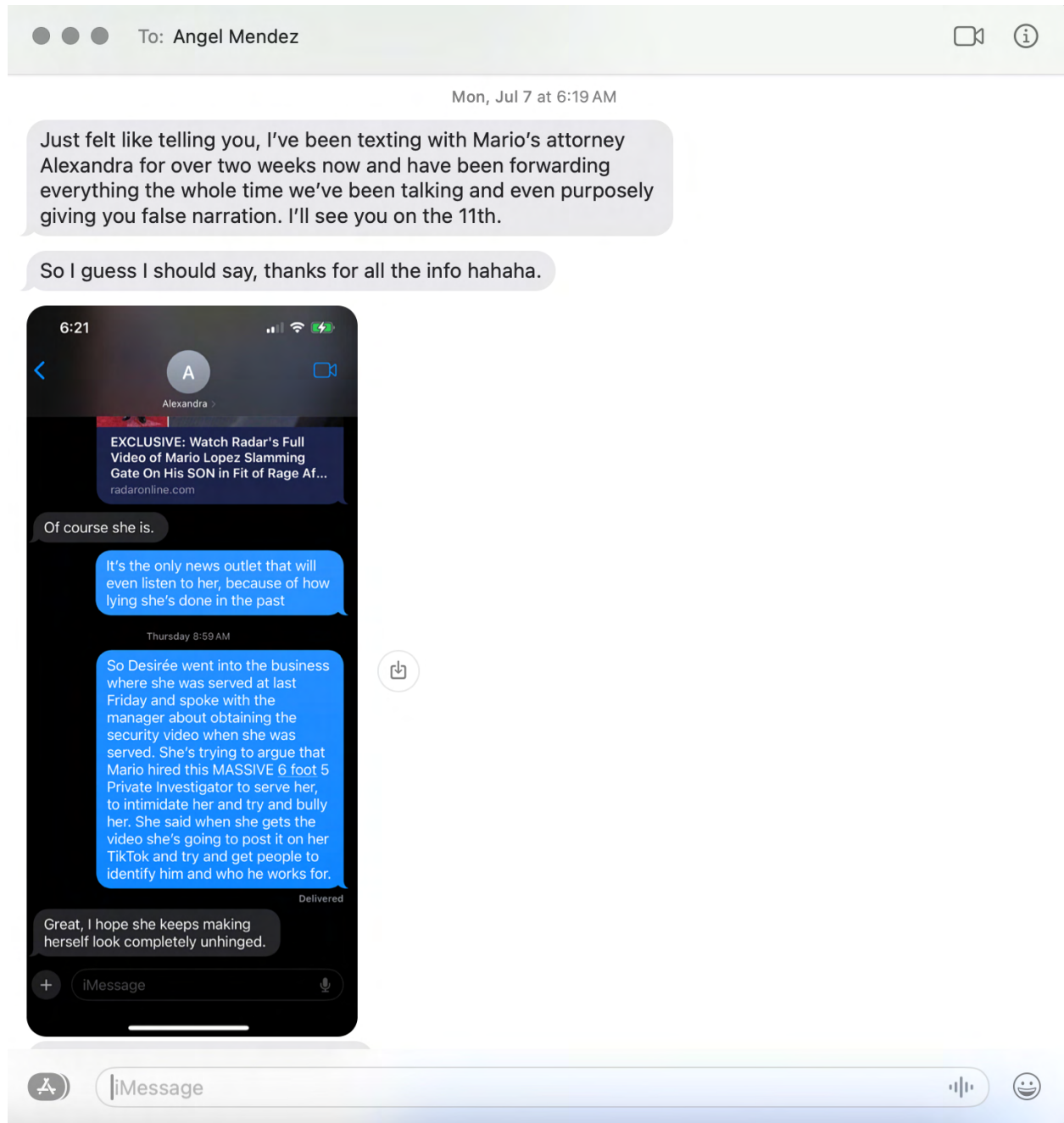


EXHIBIT C







▼ More Info:

Where from: <https://voice.google.com/u/1/messages?itemId=t.%2B18052866094>
<https://voice.google.com/u/1/a/i/895d5d372315fa7205e883ae9a7df747bbb1f3b9-1?s=3>

Dimensions: 512 × 450

Color space: RGB

Color profile: sRGB IEC61966-2.1

Alpha channel: No

▼ Name & Extension:

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▼ More Info:

Last opened: Sunday, July 13, 2025 at 1:56 PM
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Device model: iPhone 13
Color space: RGB
Color profile: Display P3
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Alpha channel: No
Red eye: No
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Exposure program: Normal
Exposure time: 1/121


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Metering mode: Pattern
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Exposure time: 1/126


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IMG_0027.HEIC

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EXHIBIT D

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Menu



District Attorney

County of San Luis Obispo

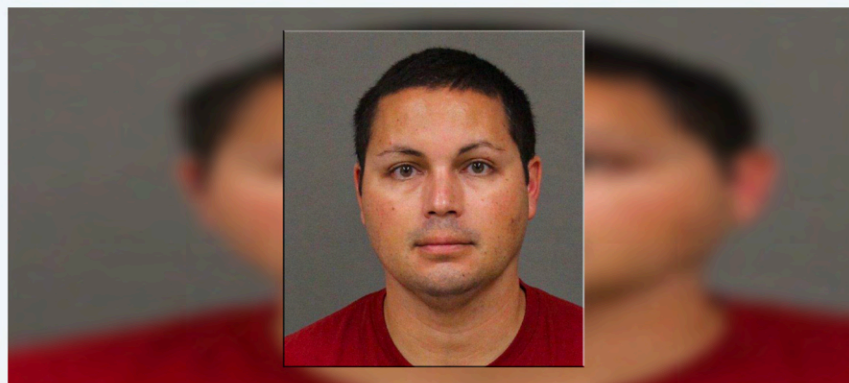
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District Attorney

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Booking Photo Josiah James Johnstone (DOB 11-23-1984)

Judge Sentences Man to State Prison for Criminal Threats and Stalking

Author: District Attorney

Date: 1/29/2020 1:50 PM

Share this:



Atascadero man sentenced to serve over four years in state prison for criminally threatening and stalking his ex-girlfriends over the course of several months.

District Attorney Dan Dow announced that Josiah James Johnstone (35) of Atascadero was sentenced yesterday to four years eight months in state prison for making criminal threats and stalking two women he had previously dated. The crimes took place between the months of February and September 2017. Mr. Johnstone pled guilty to the charges in May 2019, but fled the state before being sentenced. He was extradited back to San Luis Obispo County last September.

The victims provided statements at sentencing and noted that they were merely two of a much larger group of women who had been harassed by the defendant over the years. Several other women who have been targeted by Mr. Johnstone were present in court and stood in solidarity with the named victims.

"There is finally some semblance of closure for the victims in this case," said prosecuting Deputy District Attorney Nikhil Dandekar. "These women have displayed immeasurable bravery over the past two years, while patiently waiting for the justice system to run its course. We wish them the best, and I hope that they are able to finally sleep soundly, without fear that the defendant will show up at their doorstep at any moment."

The case was investigated by the Atascadero Police Department with the assistance of the District Attorney's Bureau of Investigation.

The sentence was imposed by San Luis Obispo County Superior Court Judge Hernaldo Baltodano.

A copy of the complaint can be accessed [here](#). A copy of the defendant's booking photo can be found [here](#).

Please contact Chief Deputy District Attorney Jerret Gran at 805.781.5800 with any questions.

#



County Government Center

1055 Monterey Street, San Luis Obispo, CA 93408

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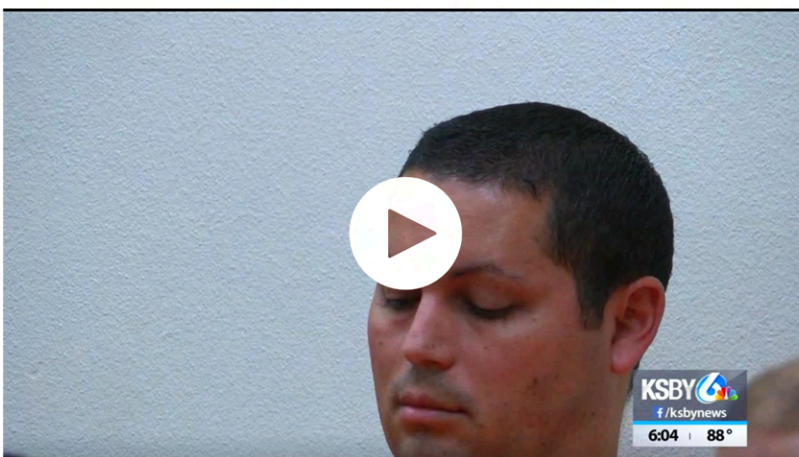
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NEWS > LOCAL NEWS



Most Wanted Wednesday suspect returns to court after being caught in Nevada



By: Megan Healy

Posted 9:07 PM, Sep 25, 2019 and last updated 11:32 AM, Sep 25, 2019

Nearly 10 women sat together in the corner of a San Luis Obispo County courtroom Tuesday, patiently, nervously waiting for the judge to call Josiah Johnstone's name.

After authorities say he skipped out on two court hearings on charges of stalking and criminal threats, Josiah James Johnstone, 34, of Atascadero was greeted in court by a group of women who say Johnstone harassed, stalked and threatened them.

One Santa Margarita woman says Johnstone threatened her years ago when she tried to break-up with him.

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"He was going to come to my house and burn it down with my mom in it if I left him, if I called the police," said Susannah Fletcher.

After she ended the relationship, Fletcher never thought she'd hear Johnstone's name again.

That is until the San Luis Obispo County District Attorney's Office called recently wanting to know more about him.



"(The prosecutor) asked me my story and he told me it's uncanny how similar your story is to these other women and would you be able to testify," Fletcher said.

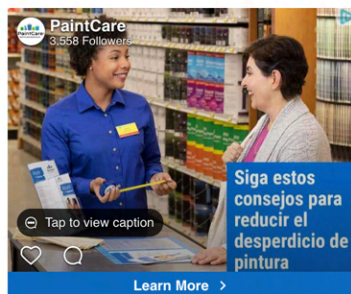
Her story is one several other women say they can relate to.

"He approached me through my business and I have reason to believe he stalked me on social media before he approached me," said Becky Heart, who lives in Grover Beach.

Both women filed restraining orders against Johnstone, they say, to protect themselves and their families.

"When he forged a relationship with me, he was very interested, almost strangely so in wanting relationships with my children," Heart said. "He knew where they worked, he knew their cars and I was fearful he would go after them."

A Bay Area woman says in June 2015, Johnstone guilted her into letting him crash on her couch.



"He targets women purposely, manipulated them for a place to stay, sex, money for their sympathies," said Shaana Keller, who lives in Vallejo. "He's done it online, in person."

She says another woman she'd never met before contacted her on Facebook at the time and warned her about Johnstone.

A judge issued a warrant for Josiah Johnstone about two months ago when he didn't show up for his court date.

He was out on bond after pleading guilty to stalking and criminal threats, but his time on the run came to an end earlier this month when Richard Dunbar, a bounty hunter, tracked him down in Nevada.

Dunbar says he found more victims and ran into his own problems with Johnstone.

"He was going to make an arrangement to surrender himself to us," Dunbar said. "We gave him our email to make that happen and Josiah threatened me."

These women say they are joined together by a man they no longer trust. They say they found comfort walking into the D6 Courtroom together.

"They are all super strong and if there are any other women out there, I hope they will come forward and join us and lend the weight of their stories," Keller said.

The DA's Office says they do not have official reports or specific details on some of these women's claims but did say that allegations from prior victims are consistent with the stalking and criminal threat charges in their current case involving two victims from 2017.

Prosecutors are deciding whether to add additional charges.

The judge denied Johnstone bond Tuesday.

KSBY reached out to Johnstone's attorney, Tom Allen, but he denied a request for an interview.

Johnstone will be back in court on October 3.

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Add Baking Soda To Your Gray Hairs And Watch What Happens

Am I the only one who never knew this before?

Paid Content: Livestly



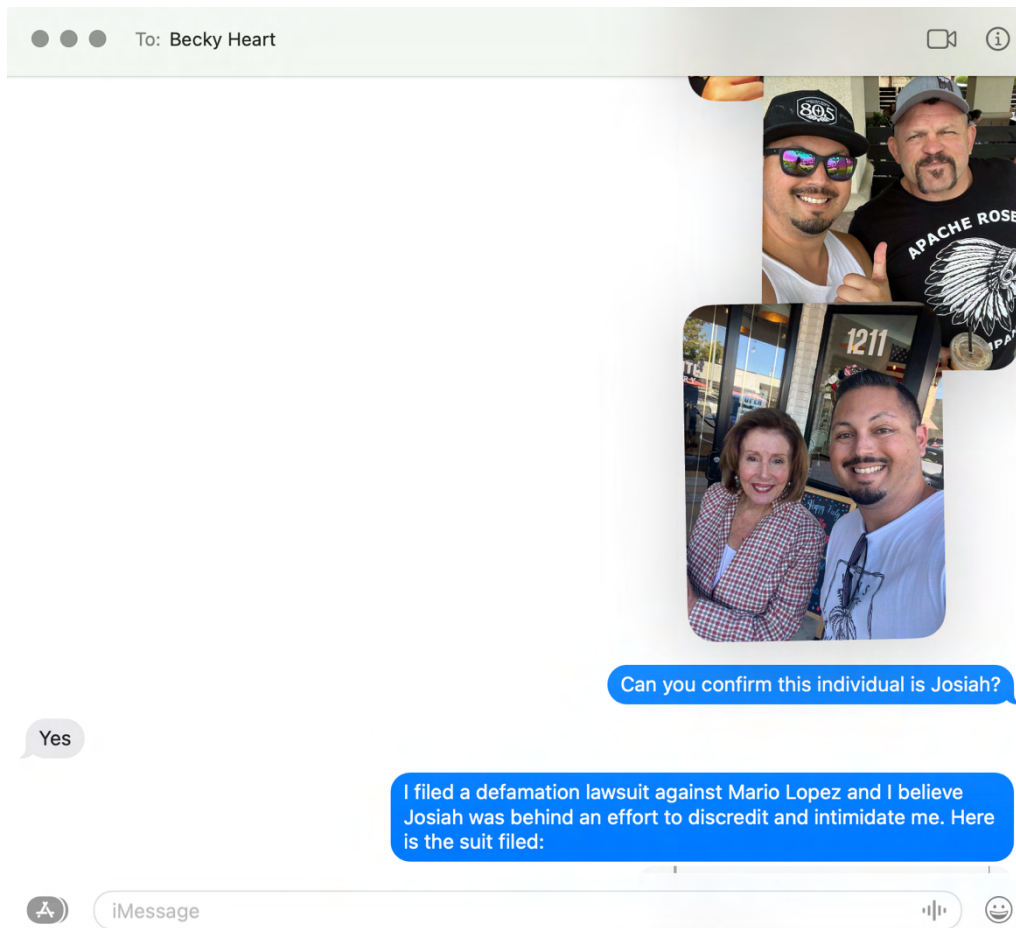
EXHIBIT E

iMessage
Mon, Jul 14 at 2:07 PM



iMessage





To: Becky Heart

I filed a defamation lawsuit against Mario Lopez and I believe Josiah was behind an effort to discredit and intimidate me. Here is the suit filed:

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Deirdre Townsend
2901 Ocean Park Blvd., Suite 201
Santa Monica, CA 90405
deirdre@apartademarks.com

Plaintiff:
DEIRDRE GUERRIERE TOWNSEND

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES - UNLIMITED

DEIRDRE GUERRIERE TOWNSEND, an individual,
Plaintiff,
v.
MARIO LOPEZ, an individual, and DOES 1 through 50, inclusive,
Defendants.

Cause No.: 25NMCV04009
ASSIGNED FOR ALL PURPOSES TO THE HON. ANNEBAGG CROWTHER, DEPT. E

FIRST AMENDED COMPLAINT FOR:
(1) DEFAMATION
(2) FALSE LIGHT INVASION OF PRIVACY
(3) INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS
(4) CIVIL CONSPIRACY

ACTION FILED: June 13, 2025
TRIAL DATE: TBD

Plaintiff Deirdre Guerriere Townsend ("Townsend" or "Plaintiff") complains of Defendant Mario Lopez ("Lopez") and Does 1 through 50, inclusive (collectively, "Defendant"), and alleges as follows:
NATURE OF THE ACTION
"Apparently I'm the bearer of fake news? What's @Ancestryfamilywood got to say about it?"
- Mario Lopez, Instagram post, @mariolopez, March 13, 2024

FIRST AMENDED COMPLAINT FOR DEFAMATION, FALSE LIGHT INVASION OF PRIVACY, INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS, CIVIL CONSPIRACY

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PDF Document · 23.2 MB
storage.googleapis.com

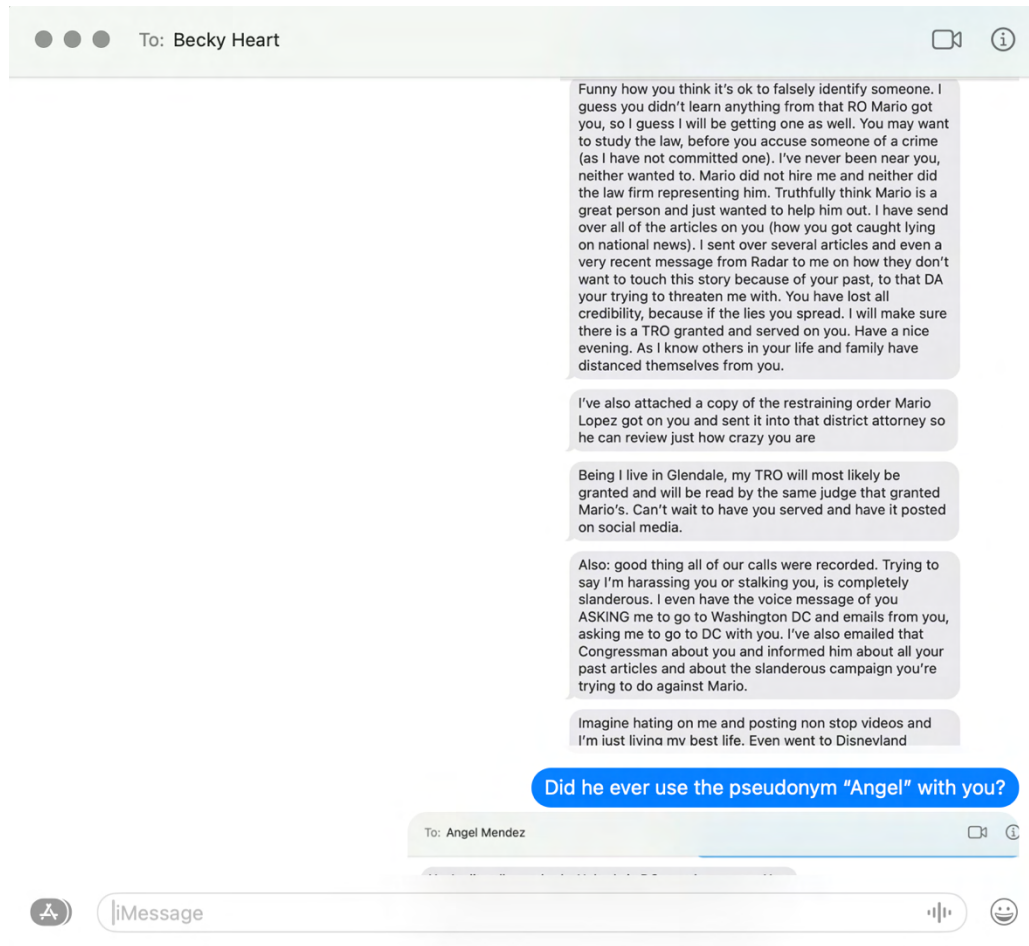
Here are the texts he sent me:

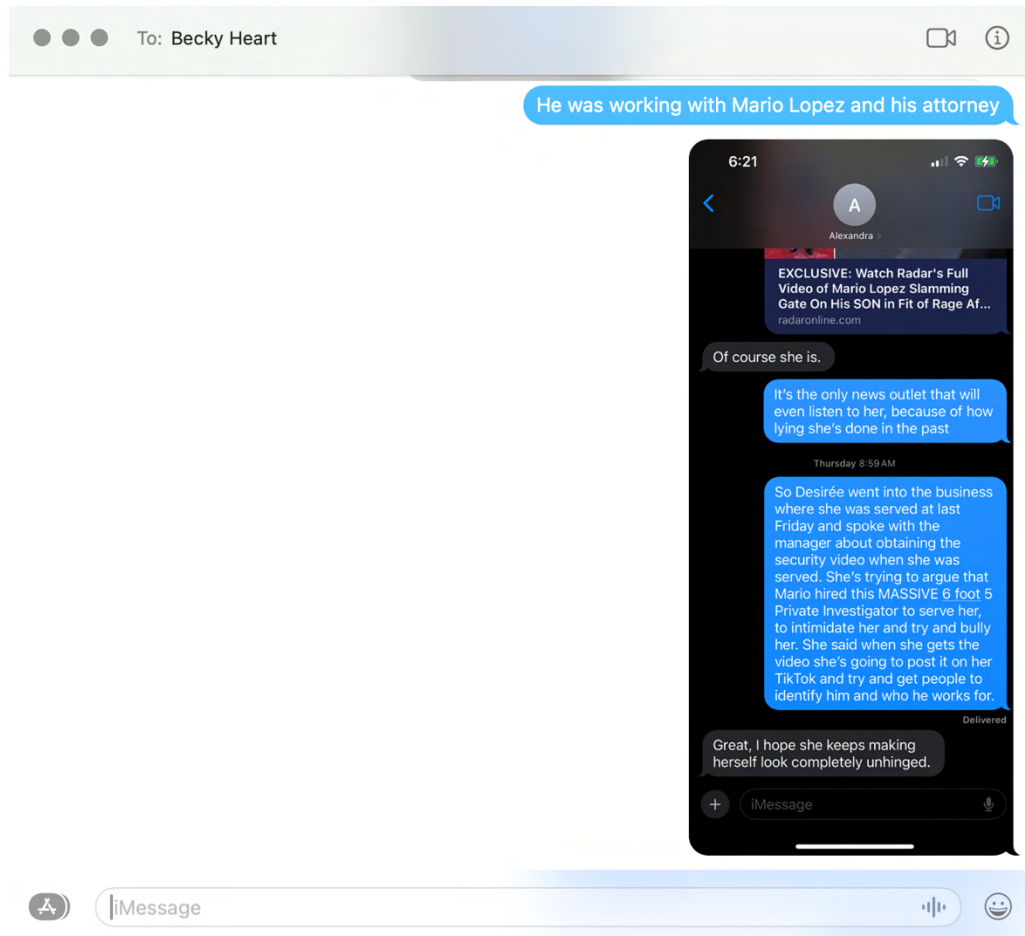
To: Angel Mendez

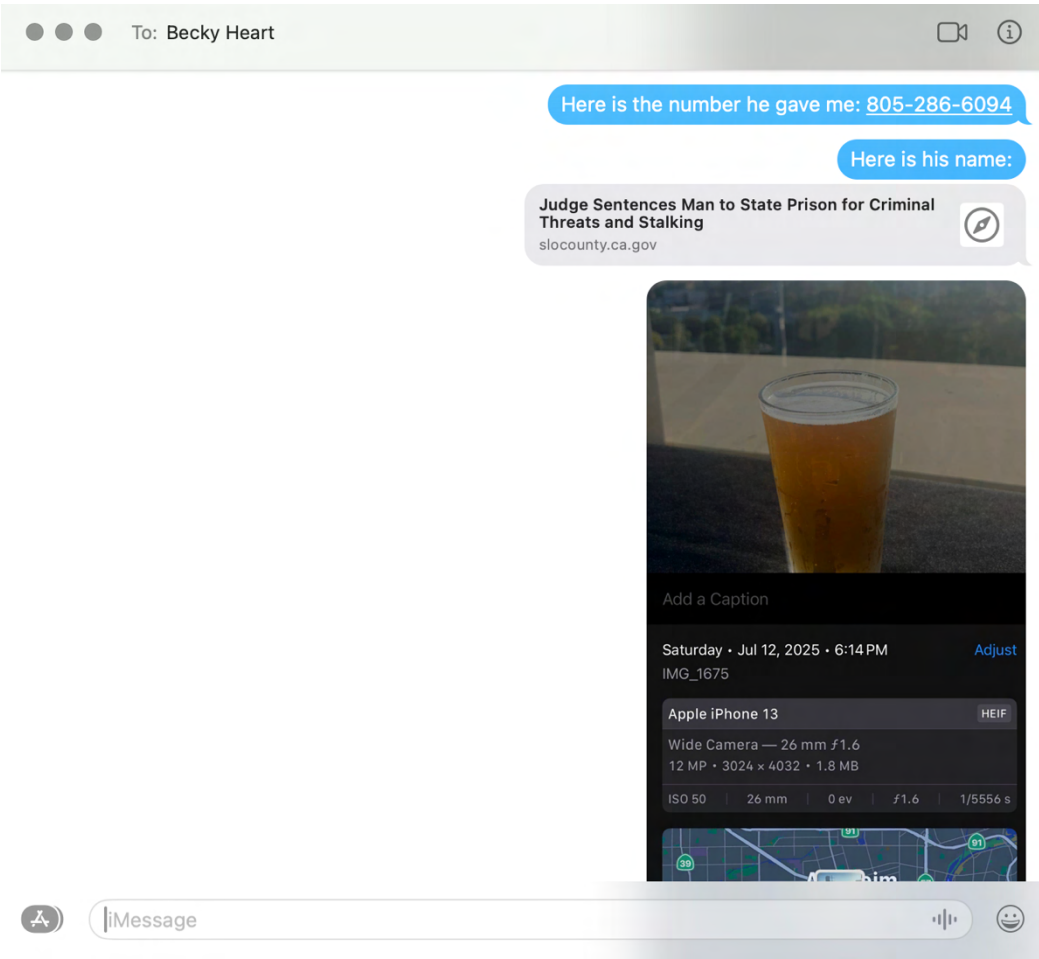
Funny how you think it's ok to falsely identify someone. I

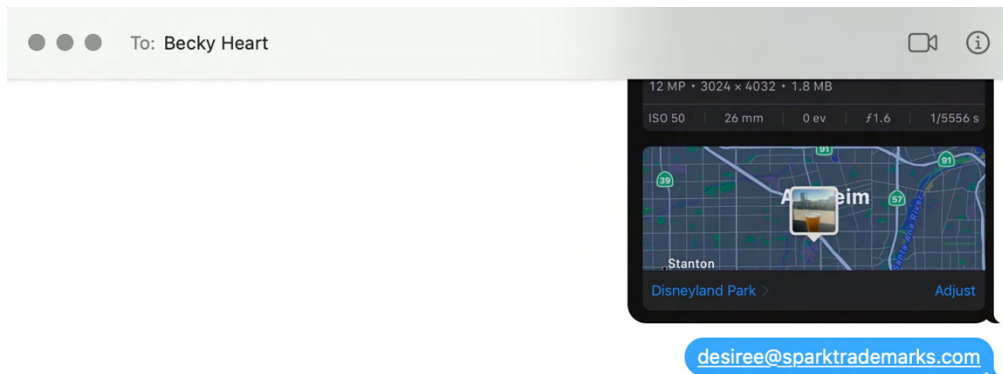
iMessage

3









Mon, Jul 14 at 7:33 PM

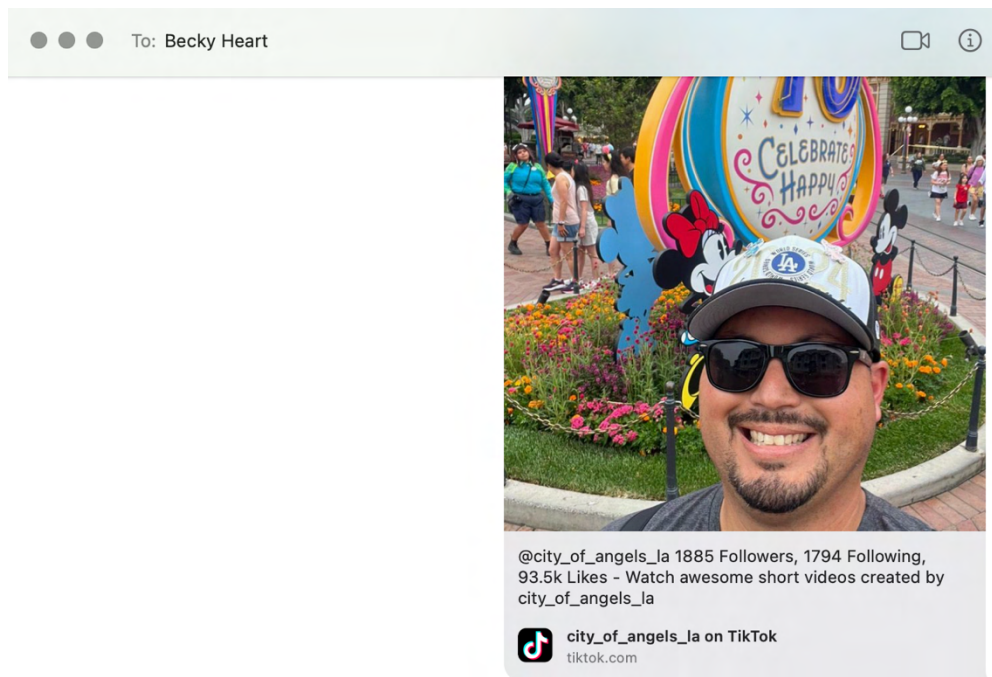
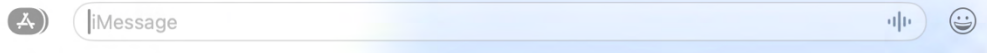
Thank you so much for speaking to you today and I am sorry for triggering bad memories.

Tue, Jul 15 at 7:19 AM

No worries.
Last night I read your entire case (what you sent me)
DAMN!! I'm so sorry that you're going through this.

I'll admit I didn't know much about Mario... I don't follow much TV and don't read "entertainment" news.
But I will say he sounds like someone who Josiah would want to emulate. They sound like very similar evil entities.

Let me know what you find out if anything. I'll support you if there's any way that I can be helpful.



Wed, Jul 23 at 9:51 AM

That's him. I don't have TikTok anymore so I won't be able to look at it...

How are you?

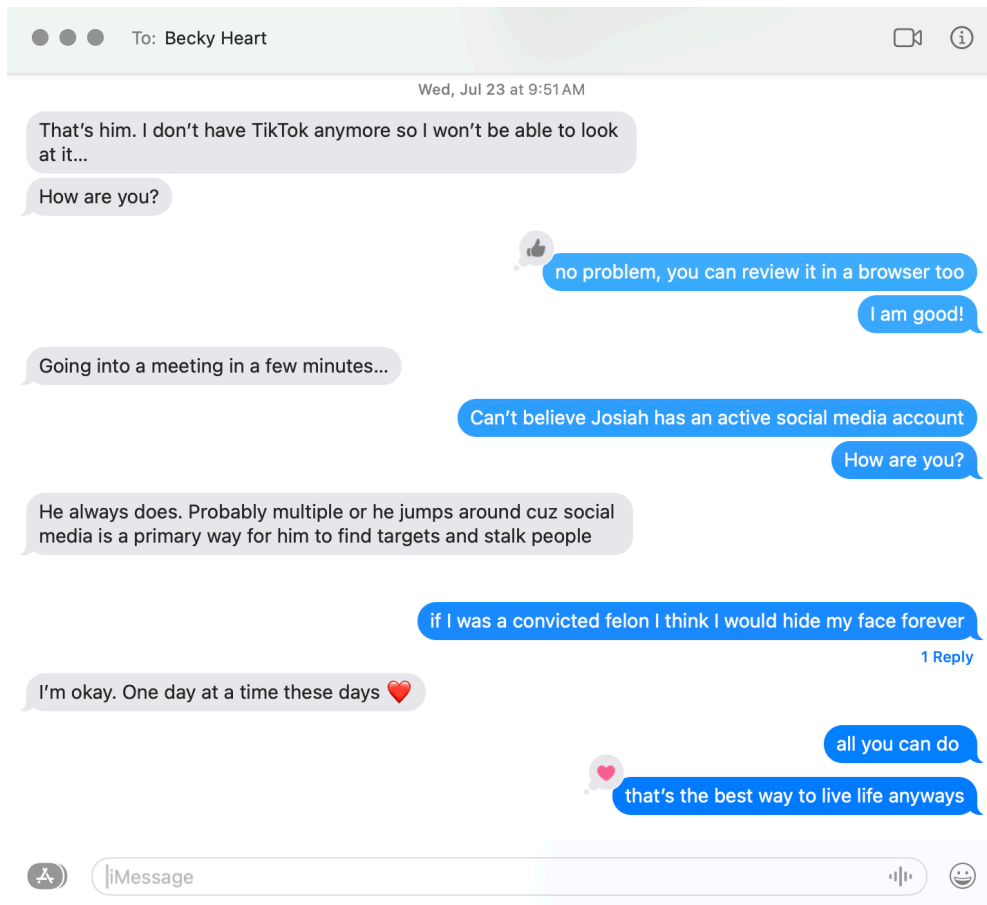


EXHIBIT F

From: Cine Gear Expo Los Angeles 2025 info@cinegearexpo.com
Subject: ACTION REQUIRED | Complete your Exhibitor Staff Registration
Date: June 3, 2025 at 11:00 AM
To: Desiree Townsend desiree@sparktrademarks.com
Cc: kathy.n@womenmedia.com, womenmedia@gmail.com



Hello Desiree,

You have been added as an exhibitor staff at **Cine Gear Expo LA 2025!**

To complete your Exhibitor Staff Registration, click the link below to agree to the show policies and procedures. This step is required to receive your official entry badge and gain Exhibitor access during the event.

[Confirm Exhibitor Registration](#)

We look forward to seeing your team bring the booth to life!

Warm regards,

Your Cine Gear Expo Team

Registration

Registration Type	Exhibitor Staff
Name on Badge	Desiree Townsend

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From: Cine Gear Expo Los Angeles 2025 info@cinegearexpo.com
Subject: Cine Gear Expo Los Angeles 2025 Registration Confirmation
Date: June 4, 2025 at 8:09 PM
To: Desiree Townsend desiree@sparktrademarks.com



Hello Desiree,

Your exhibitor registration for Cine Gear Expo Los Angeles is complete. Exhibitor load-in dates, times, and other details vary by exhibitor. Please contact your booth organizers for details.

Exhibitor Parking:

- **Free Parking**
- Enter through **Gate 8: 3800 Barham Blvd, Los Angeles, CA 90068**
- Park at the **2160 Parking Structure**
- Follow directions from event staff upon arrival
- Please review the [Load-In and Load-Out Instructions](#) for a map showing where to enter and park

Exhibitor Badge Pickup:

[Exhibitor Registration](#) will be open on Thursday, Friday, and Saturday, located adjacent to the 2160 Parking Structure.

We look forward to seeing you at the Universal Studios Lot this June!

Warm Regards,

Your Cine Gear Expo Team

Your Unique Exhibitor Pass QR Code



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Desirée Townsend ●



Legal & Business Affairs

Intellectual Property & Litigation Paralegal based in Los Angeles, specializing in copyrights, trademarks, and complex civil litigation.

[About](#)

Credits

Senior Paralegal at Hollywood Trademarks
Intellectual property & litigation paralegal

Personal Details

City

Los Angeles

Website

<http://hollywoodtrademarks.com>

Work Details

Union Status

Non-member

Legal & Business Affairs

Intellectual Property

Biography

Desirée Townsend is a seasoned intellectual property paralegal with years of experience supporting attorneys in matters involving copyrights, trademarks, and patents. Her work spans prosecution, enforcement, and strategic portfolio management across a variety of industries. In addition to her IP expertise, Desirée has extensive experience in general civil litigation, including copyright infringement, trademark disputes, and employment law. She has played a key role in preparing motions, managing discovery, and navigating complex case timelines in both state and federal courts. Known for her sharp legal instincts and deep understanding of

procedural rules, Desirée brings a strategic and detail-oriented approach to every case.



Women In Media promotes gender balance in the film and entertainment industries through networking, professional development, and advocacy for filmmakers who work above and below the line.

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WiM is a great organization that puts its money where its mouth is – especially when it comes to below-the-line professionals – granting exposure and promoting parity at every level of production.



Idit Dvir

writer/film faculty

Women In Media

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